

Appendix J

Public Scoping Comments

J. Public Scoping Comments

The scoping period for the revised Arctic National Wildlife Refuge (Arctic Refuge, Refuge) Comprehensive Conservation Plan (Plan, Revised Plan) extended from April 7 to June 7, 2010. The intent was to solicit ideas identifying special values, opportunities, and problems related to Arctic Refuge. Comments were received by email, web form, post card, fax, and letter, and through public hearing transcripts. The Refuge received 94,061 responses, of which 1,480 were original responses, and 92,581 were form letters from 10 different letter campaigns. Many people voiced similar concerns. The scoping process did not constitute a vote but was meant to provide a broad distribution of ideas and concerns regarding Arctic Refuge.

The comments were analyzed by the Bear West Company, which was contracted by the U. S. Forest Service's National Environmental Policy Act (NEPA) Services Group. Analysts produced a comprehensive database containing all comments plus "codes" that allowed comments to be organized with other similar comments and topics. Similar topics were then organized into a logical structure for the final report. The report, database queries, and original responses were used by Refuge staff and planners to identify issues. For a more detailed explanation of the comment analysis process, see the attached Summary of Public Comments.

The attached report can be cited as:

NEPA Services Group (NSG). 2010. Summary of Public Comment. U. S. Department of the Interior, Fish and Wildlife Service, Arctic National Wildlife Refuge ANWR Revised Comprehensive Conservation Plan, Notice of Intent to Prepare an Environmental Impact Statement. Salt Lake City, Utah, USA.



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Summary of Public Comment



US Department of the Interior Fish and Wildlife Service Arctic National Wildlife Refuge

ANWR Revised Comprehensive Conservation Plan

Notice of Intent to Prepare an Environmental Impact Statement

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Summary of Public Comment

Introduction

This document is a summary of public comment received following a Notice of Intent (NOI) to prepare a Draft Environmental Impact Statement (DEIS) for the revision of the Comprehensive Conservation Plan (CCP) for the Arctic National Wildlife Refuge (Refuge). The formal comment period on the CCP revision began on April 7, 2010, and ended June 7, 2010. The United States Fish and Wildlife Service (Service) received 94,061 responses, consisting of 1,480 substantive original responses and 92,581 form letters.

This document provides a project background on the CCP NOI, follows with a short description of the content analysis process, and concludes with an overview of the main areas of public concern. This summary does not provide an exhaustive account of public comments or concerns. The comments on the CCP NOI are varied and contain substantial specificity and detail. In fact, the database contains well over 4,000 individual comments. As a result, this summary provides only a general discussion of pervasive themes running through the comments, and serves as a roadmap to the various thematic areas of comment received on the project.

Reviewers should be aware that respondents are self-selected, and their comments do not necessarily represent the views of the public at large. In considering these views, it is important for the public and decision makers to understand that this process makes no attempt to treat input as if it were a vote. Instead, the content analysis process ensures that every comment is considered at some point in the decision process.

Project Background

In April 2010, the Service published a NOI to prepare a DEIS documenting the effects of a revised CCP. The new CCP would establish goals and objectives, review Refuge rivers for potential recommendation for inclusion in the National Wild and Scenic Rivers System, and review Refuge lands for potential recommendation for inclusion in the National Wilderness Preservation System.

Preparation and updating of the CCP for the Refuge is required under the Alaska National Interest Lands Conservation Act of 1980 (ANILCA). The purpose of the CCP is to “provide refuge managers with a management strategy for achieving refuge purposes and contributing toward the mission of the National Wildlife Refuge System, consistent with sound principles of fish, wildlife, and habitat management and conservation; legal mandates; and Service policies”. Additionally, the CCP will “define long-term goals and objectives toward which refuge management activities are directed, and identify which uses may be compatible with the purposes of a refuge”.

Content Analysis Process

Content analysis is a method of evaluating public comments in order to derive information and summarize themes and common concerns. While this summary does not seek to capture every specific concern, it strives to identify thematic issues for decision-makers and the public. This process and the resulting analysis do not replace comments

in their original form. The planning team and the public are encouraged to review the actual letters firsthand.

Each response is given a unique identifying number, allowing analysts to link specific comments to original letters. Respondents' names and addresses are entered into a project-specific database program, enabling creation of a complete mailing list of all respondents that provided substantive input. For more information on how form letter responses are managed, please see Appendix B. The database is also used to track demographic information such as responses from special interest groups or federal, state, tribal, county, and local governments. All input is considered and reviewed by analysts. Each response is read and sorted into comments addressing various concerns and themes. This sorting is accomplished by applying "codes" to each comment. Each comment receives two different codes: the first identifies whatever action the respondent is requesting (e.g., "the Service should designate more wilderness"); the second identifies the affected resource (e.g., "the Service should designate more wilderness *to protect wildlife*"). Comments are then entered into the database.

In preparing the final summary analysis, public issues are reviewed using database reports and searches. Analysts track coded input and strive to identify all thematic issues and concerns, not just those represented by the majority of respondents. Content analysis is intended to facilitate good decision-making by helping the planning team to clarify, adjust, or incorporate technical information into preparation of planning documents and rules. All responses (i.e., public hearing transcripts, letters, emails, faxes, and other types of input) are included in this analysis.

The analysis can be organized to follow either action or resource coding. This particular analysis follows action coding, meaning that each section of the analysis will summarize the different "actions" respondents stated the agency should take. Each summarized action may bear relationships to many potentially affected resources.

Because of the specific and technical nature of questions asked in various public forums and the resulting specificity of public comments, all parties using this summary are strongly encouraged to review the original comments as well. This analysis does not replace the comments individually, but gives insight into the comments collectively.

Overview of Comments

Public comment on the CCP NOI is far-reaching, highly detailed, and represents a wide range of values and perspectives with respect to the Refuge's planning direction. Because of the very large number of substantive comments received, and this wide range of values and perspectives, only broad generalizations or key themes are targeted in this summary. The following subsections describe the public comments received in relation to the major action themes of the CCP NOI. In each section, the analysis provides a narrative description of the theme, and follows with sample statements from the actual body of comments. These are notated with numbers corresponding to the letter number and the comment number within the letter. For example, if the sample statement is preceded by the number notation 20.3, this corresponds to letter 20, and comment 3 within that letter.

1.0 General Comments

The most common type of comments received on the project express general support or opposition, often including rationales for the positions. Commenters express a particularly strong desire to protect the wildlife, whether supporting or opposing development within the Refuge. Other very common rationales for protection of the Refuge include climate effects, general ecological protection, cultural effects, and wilderness character. Many of these comments invoke recent events in the Gulf of Mexico as an example.

Comments of general support usually don't provide a specific approach to the CCP, but instead contain a common theme of environmental or ecological preservation. These commenters often urge the Service to ensure protection for "future generations", and voice strong opposition to any development in the area. Many of these commenters oppose all development and support significant wilderness designation. Some feel that a small footprint for development is not possible, and are concerned that roads and pipelines would spread throughout the Refuge.

20.3: "If we fail to protect the Arctic Refuge now, we will lose a place that represents a connection to the natural world that has been lost across much of our nation. Together, we must do everything we can to ensure that the Arctic Refuge remains undiminished for future generations."

596.4: "Manage the Refuge to provide wildlife the space and time to adapt to climate change in the absence of human intervention."

492.3: "The plan should address open space and the preservation of free-roaming wildlife populations as a high value, long-term sustainable option."

389.3: "The Gwich'in people have lived in the Arctic region for thousands of years, and regard the Coastal Plain as "The Sacred Place Where Life Begins" because it has been the most frequently used birthing and nursery grounds for the migratory Porcupine Caribou Herd. The social, economic and spiritual fabric of the Gwich'in culture depends on the survival of these caribou. The CCP should

strive to preserve the wildlife, wilderness and subsistence values necessary to maintain the Gwich'in way of life for many generations to come."

113.5: "Given the recent and continuing disaster in the (to us) nearby Gulf of Mexico, we feel strongly that oil and gas leasing, exploration, development, and extraction pose far too great a risk to wildlife and wilderness values, and should not be permitted in the Coastal Plain or any other portions of the Refuge. As you know, tundra is particularly vulnerable to human activities. We would not want to chance any such disaster occurring in Alaska – our national crown jewel."

Many commenters feel the Refuge should be used for development of oil and gas. Reasons include economic benefits to the economy, safer onshore drilling practices, national security, and public access. These comments often focus on not allowing more wilderness designation. Some oppose claims that oil and gas development has adversely affected wildlife populations in the Arctic, sometimes commenting that populations increase because the animals use developed areas to their advantage. Some commenters speak to the technological aspects of drilling, discussing how modern drilling techniques have reduced the amount of human interference with wildlife and habitat.

689.3: "Our state already has 58 million acres of federal wilderness - nearly the size of the upper east coast of our country. The refuge already has 92 percent of its acreage assigned to wilderness; that is enough."

23.1: "I strongly support continuing to allow oil and gas exploration in the 1002 area of the coastal plain. As the single best on-shore prospect for oil in the United States, with estimates of billions of barrels of recoverable oil available, it is an important part of our nation's overall energy strategy. It would be foolish, in the extreme, to disallow exploration and development of this critical resource."

273.3: "Since have been no measurable effects on North Slope populations of caribou, polar or grizzly bears, arctic foxes or mush oxen in the 50 years of oil exploration, development and production, I am convinced the science supports opening Area 1002 to oil and gas development. There is no reason for yet another study."

534.2: "Given the technological advances, and with the environmental safeguards that are currently applicable to all oil and gas activities in the Arctic, development can take place on the Coastal Plain in an environmentally sound manner without lasting effects."

260.3: "Part of the responsible stewardship does include oil and gas production, which provides jobs and revenues that are necessary to support public services such as health care and education. These revenues, furthermore, enable indigenous populations to maintain culture and traditions that would not be possible if they were forced to migrate elsewhere for revenue and jobs."

2.0 Analysis

This section covers comments that were received in relation to the scope or content of the Draft Environmental Impact Statement and the Comprehensive Conservation Plan to be prepared. While a relatively small percentage of comments focused on the details of these analyses, the comments are more specific than in many other areas of content. Generally speaking, the major themes for Analysis are the need to update studies and to employ effective monitoring and inventories.

A minor theme is the adequacy of studies. Commenters note that many studies have been done to analyze resources on the Refuge, but want to have assurance that any studies used are adequate and up to date. Some also mention a concern that the studies provided should not be censored. Others request that more specific studies be completed prior to making management decisions.

82.4: “Senator Lisa Murkowski asked me to stress once again, that if in fact the study team even considers studying the area for a wilderness recommendation, it should authorize new winter-time seismic data acquisition across the coastal plain because it is impossible to weigh the merits of a wilderness designation recommendation, without knowing, using modern 3-D and 4-D seismic technology, the likely resources of the area.”

162.2: “I would urge you the people working on the ANWR and 1002 issues to be very careful to get the full scientific story on the issues like caribou. And in my comments, which I submitted written comments, there's elaboration on this and there's also some reprints of papers that will be useful to you. One final observation was in -- it was around 2000 when Secretary of the Interior Norton asked -- was asked by Senator Frank Murkowski to answer some questions on ANWR and one of them was regarding caribou. And she used information provided both by her staff or her -- the people in Fish and Wildlife Service, in addition to information that I provided her and she was roundly criticized in the national media by anonymous employees of Fish and Wildlife for using the published information that I had provided her. Saying, well, he used to work for the oil industry, which I did, I was a contractor. So I urge you to allow science to operate as science and be very careful of attempts at censorship one way or the other to influence your guys' -- the information you get and present to the public and the policy makers.”

The most common Analysis theme is the need to update, change, or add data to the existing body of knowledge. While some commenters state there is plenty of data surrounding the Refuge and its potential for energy, others are concerned with the data and see the need to update older data with new, more accurate data. This includes data relating to climate change, oil and gas estimates, and wildlife numbers. Some respondents ask for specific new studies, such as a “Traditional Access” study. Responders also want to make sure that any info used from these studies has a long term planning focus.

269.3: “The overwhelming amount of knowledge that you all have and that the Service has about the Arctic now serves as a very incredible baseline for scientific study. With the change in the climate that's ongoing now, it provides a great opportunity not just to protect the wilderness of the Arctic for posterity, but also to serve as a scientific laboratory. And so I urge you to think about it that way in looking at the review of the conservation plan.”

301.2: “Avoid doing anything within the Refuge related to quick, short-term thinking.”

732.3: “A study should be done to up-grade the baseline study done in 1987 taking into account differences caused by climate change.”

430.7: “Section 811 Traditional Methods of Access – ANILCA Section 811(b) directs the Secretary to allow use of snowmobiles, motorboats, and other means of surface transportation traditionally employed by local residents for subsistence purposes, subject to reasonable regulation. If resource concerns associated with traditional modes of access are anticipated, we [State of Alaska Office of Project Management and Permitting] urge the Refuge to first document pre-ANILCA access before promulgating regulations to implement management restrictions. In addition, we request the Refuge make this a cooperative study with the State to take advantage of our historical data.

The other major analysis theme is monitoring. Respondents urge the refuge to maintain data on several resources and topics. Climate change, water and air, wildlife, invasive plants, and recreation are the key topics of discussion.

79.2: “Keep monitoring water and air quality, as the arctic is affected by what happens around the globe.”

367.34: “The revised plan should also require continual monitoring of motorized access across Refuge lands to determine their impacts. If significant impacts are detected, regulations must be developed, including proper public notice and review, to “protect natural and other values of the conservation system units.” In this context, “other values” should include physical and living resources, such as soils, plants, and wildlife, and intangible values, such as solitude, wilderness character, and aesthetics. Since the use of all-terrain vehicles in the Arctic Refuge was non-existent when ANILCA passed and was not specifically allowed in the law, ATV's cannot be authorized for general public access within the Refuge.”

650.5: “We [The Wildlife Society] believe that the CCP should emphasize the importance of research and monitoring on the Refuge to assess the effects of climate change on arctic wildlife. There is a substantial amount of baseline information on wildlife populations and habitats of the Arctic Refuge thanks to studies on the 1002 Area, elsewhere in the Refuge, and in adjacent areas. That baseline information is most useful if there is continued monitoring of wildlife

populations and their habitats, assessment of species distributions, and measurement of climate variables on the Refuge. The CCP should encourage collaboration with academic institutions and continued cooperation with other government agencies in monitoring and research programs that address wildlife populations, ecosystem function, and the effects of climate change.”

684.2: “Monitor recreational use, hunting, and “traditional” Native use. There may need to be limits placed on these activities to limit overuse and destruction of wilderness values.”

Several respondents discuss the content of the CCP document itself. Some support or oppose the Draft goals set by the CCP. One respondent asks for clarification of the specific activities the Draft CCP will allow in relation to oil and gas exploration activities and transportation methods. Other comments were made relative to the clarity of the CCP’s draft goals, and suggest specific review or revisions.

694.26: “We seek clarification from the Service in the Draft revised CCP EIS regarding new oil and gas exploration activities, such as geo-exploration and seismic studies, core sampling, and other geophysical studies or development activities in both the minimal and wilderness management categories, and we strongly urge the Service to disallow these activities in the refuge in both minimal and wilderness management categories. We request the Service develop alternatives in the DEIS that do not allow for such activities. We feel strongly that new exploration activities, such as those mentioned above, which involve mechanized surface transportation and/or are helicopter-supported, are inappropriate in refuges overall where the federal government owns the subsurface estate, much less in minimal or wilderness management categories.”

498.1: “What is important: The most important part of the draft goals are that the refuge be preserved in as much of a natural state as possible, that access for Native peoples be maintained, and that all fish and wildlife be preserved. Draft goals # 2 and 3 adequately reflect this. ANWR represents a living legacy of wildness for our country that cannot be replaced if it becomes damaged.”

654.3: “For the most part, the draft goals are an excellent guide for addressing stewardship challenges and ultimately fulfilling Refuge purposes. Goal 8, which proposes a range of management actions to include ‘active management of species and habitats’ contradicts other goals such as Goal 3 which states: ecological processes are allowed to shape the environment, essentially free of intent to alter or manipulate the natural order.” To fulfill the ultimate intent for the Refuge as stated Olaus Murie: ‘a small part of the Planet is left alone,’ we recommend that Goal 8 be changed to read: Effects of climate change on Refuge resources are evaluated through research and monitoring, and are considered when making management decisions.”

Other respondents support updating the conservation plan and feel that the Draft Goals within the CCP are adequate to preserve ANWR, its wild characteristics, and Native cultures.

755.4: "...I wanted to say I am extremely supportive of the CCP process that the Fish & Wildlife Service is undertaking, and I strongly support the effort to update the conservation plan for the Arctic National Wildlife Refuge."

462.1: "What is important: I think that maintaining the exemplary wilderness and wildlife qualities of the Refuge should be the top priority in developing the revised CCP. I believe that the stewardship draft goals published in the April 2010 Planning Update are well thought-out and provide a good framework for developing the revised CCP."

A few comments discuss the appropriate scope and scale of analysis. Most of these comments talk about whether the review of oil and gas development is out of the CCP scope, and to what extent wilderness designations may further alter oil and gas leasing activity and opportunity in the future.

373.2: "The Borough agrees with the FWS that the agency does not have the authority to decide whether any lands within ANWR should be opened to oil and gas leasing. We therefore appreciate that the FWS will not consider or respond to comments on that issue during this planning effort. That being said, the agency must recognize that any designation of lands within the 1002 area of ANWR as wilderness that occurs as a result of this CCP revision will effectively foreclose those lands from being opened to oil and gas leasing. Beyond the oil and gas question, for our community of Kaktovik to find itself surrounded by designated wilderness would severely limit options for its future economic development."

Poignant comments from one federal agency discuss several aspects of NEPA compliance in the CCP and DEIS, including discussion of the "purpose and need", "range of alternatives", and "cumulative effects".

627.2: "Purpose and Need: The CCP/EIS [Comprehensive Conservation Plan/Environmental Impact Statement] should clearly identify the underlying purpose and need to which FWS [US Fish and Wildlife Service] is responding to in proposing the alternatives, including the broader public interest and need. While the development and revision of CCPs for national wildlife refuges in Alaska are governed by the Alaska National Interest Lands Conservation Act (ANILCA) and the National Wildlife Refuge System Administration Act, we [Environmental Protection Agency] believe it is also important that the plan consider the intent of Refuge's organic legislation (Public Land Order 2214).

Given the unique circumstances of the Refuge's goals of conservation, fulfillment of international treaties, subsistence uses, and water preservation, along with the FWS's recommendation in 1987 for the "orderly oil and gas leasing of the 1002

area”, it is particularly important that all current goals and purposes established for the Refuge be clearly articulated in the draft CCP/EIS. The purpose of the proposed action would typically be the specific objectives of the CCP/EIS, while the need for the plan may be to eliminate a broader underlying problem or take advantage of an opportunity. Thus, the purpose and need should be a clear, objective, but comprehensive statement of the rationale for the proposed action, as it provides the framework for identifying project alternatives.”

627.3: “Range of Alternatives: The CCP/EIS [Comprehensive Conservation Plan/Environmental Impact Statement] should include a range of reasonable alternatives that meet the stated purpose and need for the CCP/EIS and that are responsive to the issues identified during the scoping process. The Council on Environmental Quality (CEQ) recommends that all reasonable alternatives be considered, even if some of them could be outside the jurisdiction of the agency. Also, the environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. The potential impacts of each alternative should be quantified to the greatest extent possible. It would also be useful to list each alternative action’s impacts and corresponding mitigation measures. EPA [Environmental Protection Agency] encourages selection of feasible alternatives that will minimize environmental degradation. We also believe that given the recognized risks of offshore exploration activities, additional consideration and planning may need to be reflected in certain alternatives to adequately address these potential risks. Such planning may be critical given the isolated nature of the Refuge.”

627.4: “Environmental Effects: The CCP/EIS [Comprehensive Conservation Plan/Environmental Impact Statement] should include environmental effects associated with the various alternatives as well as the proposed mitigation measures. This would involve delineation and description of the affected environment, indication of resources that would be impacted, the nature of the impacts, and a listing of mitigation measures for the impacts. The following topics are of particular interest to EPA [Environmental Protection Agency].”

627.13: “Cumulative Effects: CEQ definitions of cumulative impact is “the impact on the environment which results from the incremental impact of the actions when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.” The cumulative impacts analysis should therefore provide the impacts of other past, present, and reasonably foreseeable projects of actions and then considering those cumulative impacts in their entirety. The CCP/EIS should include and analyze present and reasonably foreseeable projects and actions proximate to the Refuge and vicinity (such as ExxonMobil's Point Thomson project and Beaufort offshore activities). Where adverse cumulative impacts may exist, the CCP/EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. The CCP/EIS should clearly identify the resources that may be impacted by cumulative effects,

the time over which impacts are going to occur, and the geographic area that will be impacted by the proposed project. For each resource analyzed, the CCP/EIS should:

- Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date.
- Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis.
- Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. For example; what will the future condition of the watershed be?
- Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives.
- Identify opportunities to avoid and minimize impacts, including working with other entities.”

3.0 Process

Commenters on the NOI provided substantial input on process considerations related to the CCP. These comments provide many perspectives and suggestions for the agency in relation to the process of preparing the revised CCP and DEIS. Major themes include decision-making philosophy, outreach, public involvement process, public meetings, and the influence of politics and special interests in the process.

The agency's decision-making philosophy is a significant concern to many respondents. Many commenters provide strongly worded comments on how the refuge should base its decisions and analysis. Many feel that decisions should be based on quality science, or on protecting biological diversity. Others feel that the preservation of wilderness character should guide decisions. Alternatively, some respondents feel that decisions should be made in a multiple-use framework that allows development activities including oil and gas exploration and extraction.

1289.7: "I look forward to your agency's appropriate decision based truly on science and on quality of the environment criteria."

211.2: "What should Refuge staff do, or avoid doing, to best meet Refuge purposes? Value wildlife conservation and diversity over all other competing interests."

190.3: "We need a conservation management plan that acknowledges the cumulative impacts that allowable uses have on the very wilderness qualities that the refuge seeks to preserve. I urge the agency to maintain or to implement strong management policies and practices within the refuge that balance allowed uses of subsistence, recreational scientific and those other allowed purposes with preserving the refuge's intrinsic wilderness qualities. I think that if this conservation plan currently being developed for the refuge does these two things, inspiring permanent wilderness designation for the refuge lands and setting out balance strategies to promote uses of the refuge that do not impact its wild nature, then the plan will preserve that refuge and future generations of refuge stakeholders will be well served."

636.6: "We would be happier if oil and wilderness occurred far away from each other. That is not always the case, and we are not doing ourselves any favors by denying the potential for multiple uses on the edge of this vast refuge. Oil development has been done safely onshore in Arctic Alaska, and it can be done without denying the wilderness values and resources we all care about. As you weigh the options for the 1002 area, I hope you will keep in mind that it has always been a land of many uses. It can and should remain so."

794.1: "I am just giving testimony to the Fish & Wildlife Service and to the National Park Service on behalf of maintaining the wilderness nature of the Arctic National Wildlife Refuge. I'd like to reaffirm it's a 50-year commitment to having a place on the planet and especially on North America which is preserved for the

scientific observation of biological diversity, biological adaptation, and also open for wilderness recreation activities.”

Respondents are passionate about the educational opportunities that are available in the Refuge; some would like to see the Refuge used as a tool for teaching children. Others want to see the education of people who use the refuge for recreation. Some commenters express interest in showing that a wilderness designation does not close off all subsistence use. Overall there is a strong desire for expansion of refuge education.

62.2: “...The staff does a great job already of displaying to the public and decision makers all the wealth of wildlife that exists in ANWR. I would recommend scaling up efforts in this direction further to show what is at stake. Perhaps an online forum to highlight what is at stake will get the public involved.”

504.2: “I think that staff should educate visitors on minimum impact and how to tread lightly on this unique land. I think the land should be managed in a way that prioritizes natural ecosystems and wildlife but also honors unique human relationship that have co-evolved with the land. I know that sometimes this can be a hard balance but seems important to maintain the self-determination of Native peoples in the area who are living in traditional ways...”

731.1: “Hi, I'm glad to hear so many ideas and comments. I have a couple of ideas for community. I wonder if it's possible to make a video type documentary on the ANWF. From the beginning. [Youth] such as my also does not know the history and also the future of the Refuge. I think it'll be a hit and to start getting the up and coming adults to be involved and educated in our homelands and what the government is doing and how it works. Not only for us, but for all who want that information. Maybe even have a select group of interested students to maybe go on rafting / or summer experience within our refuge. Maybe plan a week or 2 for camping know the cultural/recreational activities.”

Several respondents provide input on the public involvement process. Some commenters want to find out how to get more involved, and request how to get involved with specific parts of the process, and also suggest ways to increase public input. Some commenters caution the Service to be careful to work through an appropriate government-to-government consultation process with Native governments.

875.10: “I think we've really got to, you know, step into this and understand that if we don't get involved today, any changes that we see in the regulations, whether it's on the federal level or the state, it will really come to haunt us because it's harder to change it after it's in place. It's a lot easier to step forward when you really have the time to offer, your input. Get involved. There are advocacy groups out there that will always help, but they, too, are very limited in numbers. We have to be there with them.”

368.10: “It appears that changes to the management of the Refuge could potentially affect tribal members directly or indirectly through the resources on which they rely, particularly in the communities of Kaktovik, Arctic Village, Venetie, Fort Yukon, and Chalkytsik. As such, the CCP/EIS should describe the process and outcome of government-to-government consultation between FWS and each tribal government involved, the issues that were raised, and how those issues were addressed. Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the U.S. government-to-government relationships with federally recognized tribes.”

216.4: “Before any 1002 decisions are made the USFWS must consult with residents and Borough officials there. The roster of public meetings has seemed to intentionally avoid this glaring need.”

Several commenters mention meetings and collaboration. Most concerns point to Natives wanting a better chance to be involved in meetings. Some respondents also state that they would like more meetings in Alaska and non-Alaska locations, in order to get more people involved. Others express a desire for translators at meetings so that everyone can understand what is said.

746.7: “As you say the Refuge is of National Interest and also of global concern. Therefore I think further public meetings should be held at more places in the lower 48 states. Here in Washington State for example, we have long ties and business and recreational interests in Alaska and people would like the opportunity to speak at public meetings. The Canadians also with their two adjacent Parks have a great deal of investment in what happens in the Refuge and should have an opportunity.”

161.2: “It is important for me to point out that the public hearing process afforded to us by the US Fish and Wildlife Service provides insufficient opportunities for the local communities that will be most affected by the plan revision. Although approximately 63 percent of the refuge lies within the boundaries of the North Slope Borough and 100 percent of the Coastal Plain that could be recommended for wilderness is located in the region, only one out of six public meetings are to be held in our region. Additional public hearings in the region are necessary to provide a fair and meaningful opportunity for the most affected communities to participate in the plan revision process.”

686.7: “... The refuge area is pretty hard to control the 1002 area by ourselves, I'd like to see Fish and Wildlife and our people, more of our people work to them in Fort Yukon, Arctic Village, maybe Venetie, so they could have people there so they could work with them, and in that way communicate more with one another and we'll know what's going on in the refuge. It's important because a lot of time

we don't communicate too much with Fish and Wildlife. The language is another problem, I know there's a lot of Native people, Athapaskan people, don't understand what's going on in that big meeting, we don't even have an interpreter. A good thing I've seen going on in Canada, all the elders sitting at a table, they use earphones and translate the language to them, that way they always talk about, they can understand what we have been talking about. If the elders understand what is the subject and what issue we talk about, then a lot can stand up and say something to us, we can't do it without them, they know a lot about in the past, in history. That's another thing that is missing every time a big meeting goes on, it needs to take time, it would be good for us to work with Fish and Wildlife. We've been working with Fish and Wildlife, I know that when we write a story, then some of our people they can do it and translate in our own language, that should go along with the two language translation, then our people will understand more."

A few commenters mention the NEPA process, generally providing support for using the process. Some provide specific criticisms of how the process has been employed. One agency of the State of Alaska provides some of these criticisms.

364.3: "When an agency limits the scope of alternatives that it will review, courts apply the 'rule of reason' to determine whether an EIS analyzed sufficient alternatives to allow the agency to take a 'hard look' at available options. While consideration of alternatives is 'the heart of the environmental impact statement' '[a]n agency is under no obligation to consider every possible alternative to a proposed action, nor must it consider alternatives that are unlikely to be implemented or those inconsistent with its basic policy objectives.' Nevertheless, an alternative must be considered if it falls within the agency's statutory Mandate.

Here, the Service has said that it will not consider oil and gas development before it issues a revised CCP and, apparently, the EIS. It explained that drilling in ANWR is off-limits and only Congress has the authority to lift the ban. No other explanation for limiting the comments was given. The Service has therefore concluded that it is unnecessary to require the agency to consider the environmental impacts of a prohibited activity."

364.3: "There are at least three significant problems with the Service's position. First, NEPA provides that federal agencies must "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resource. There is obviously a conflict over alternative uses for the 1002 Area. Hence, the Service must consider oil and gas development as an alternative."

Some commenters provide comments focusing on archaeology the process and need for preservation of cultural resources. A few commenters express sentiments to the effect that archaeological resources should be left alone when found. Some would like to see archaeological and cultural information developed in partnerships with Natives. One federal agency discussed the process for integrating the cultural and NEPA processes in

the correct order. A state agency commented about the need for strategies to study and recover specific types of archaeological material that is being seasonally exposed by high-latitude warming.

627.18: “We [EPA] recommend that no Record of Decision (ROD) be completed until the processes of consultation, analysis, review and documentation required by Section 106 of NHPA have been fully completed. If adverse effects to historic properties are identified, any Memorandum of Agreement (MOA) developed to resolve these concerns under Section 106 of NHPA should be referenced in the ROD. Unless there is some compelling reason to do otherwise, the Section 106 MOA should be fully executed before a ROD is issued, and the ROD should provide for implementation of the MOA’s terms.”

430.6: “In recent decades, archaeological discoveries have occurred on glaciers and perennial snow patches across the Arctic. These discoveries often include rare organic tools lost in the snow and ice over millennia by hunters pursuing caribou. Frozen organic artifacts from these sites provide detailed information on past ways of life. High latitude warming is exposing these unusual finds. There is a high probability that the refuge contains such artifacts that are being seasonally exposed to the elements. In support of the draft goal to conserve archaeological resources, we recommend the CCP include strategies to study and recover these significant resources.”

657.6: “Don’t allow digging for artifacts and other archeological invasions of the area. Leave old sites alone. “

367.45: “Cultural, Historical, and Archeological Resources: FWS should address cultural, historical and archeological information in the CCP, and develop it in partnership with tribes and local communities. This should include projects that involve oral histories and expertise from elders, and culture and science camps for youth. Traditional ecological and local knowledge should be incorporated into the CCP. There is considerable new information in books, articles, websites, and so on, about cultural, historical, anthropological and archeological resources.”

280.4: “Archeological and cultural resources should be left in their natural context unless threatened by loss. Excavations undertaken for scholarly papers, graduate degrees etc. should be prohibited. Features that are currently nameless should remain so. The agency should not propose or support the naming of any features.”

The final process-related theme is the influence of interest groups or politics. Many respondents provide comments reflecting concerns about the power of interest groups and politics in the decision making of the CCP. Respondents feel that there are political pressures shaping the Service’s decisions, particularly in relation to the oil industry. Many comments were centered on the idea that there has been a history of political and corporate pressure which has led to unscrupulous drilling practices.

1448.7: “I urge you to consider the national and global significance of the Refuge and lay out a clear plan for safeguarding its wildlife and wilderness values, a plan that is safe from political manipulation.”

823.3: “It is now abundantly clear the government has proven itself incapable of adequately regulating the industry. No doubt due largely to big oil's generous lubrication of campaign of Congress...”

875.14: “Oil companies are big companies; they do have a lot of influence. And I hate to say this, but I know regional corporations are doing the same thing. They're going to Congress to change the regulations. They're going to Congress to change laws, ask for amendments to laws. We thought when these laws came into effect and people said that was the end of that, that's the law, well, we're finding out now that it's changing almost every year.”

4.0 Activities and Uses

Four primary areas of activities and uses were identified: Commercial Activities, Government Activities, Private Activities, and Native/Tribal Activities. The comments surrounding each of these topics are presented in separate subsections below.

Commercial Activities on Public Lands

Most commenters provide some level of support or opposition to commercial activities within the Refuge. Comments regarding commercial activities cover several different areas of subject matter. As with other sections of this summary document, many comments specifically supporting and opposing oil/gas/mining within the Refuge were received. Some commenters asked specifically that some areas of the Refuge be designated to be “commercial-free”. Some of these commenters cautioned the Service to not let commercial uses trump private ones. Several commenters identified their desire to see more or better protection from organized, commercial recreational activities should be controlled. Other comments focused on insuring the backcountry experience and key ecological sensitive areas are protected.

1382.11: “Identify unique or fragile ecological areas of the Refuge, and designate them as commercial-free areas.”

375.18: “Since human-powered wildland recreation is a purpose of the Arctic Refuge, the use of airplanes to access Refuge lands for human-powered wildland recreation activities should continue to be allowed. Recreation that is focused on commercial purposes, advertising, racing, or competition, e.g., use of snow machines for “high marking” contests and other such uses, should not be permitted.”

657.7: “As for commercial aspects, be careful. Don’t allow commercial interests to have too much influence. Private use must always have priority over commercial uses and those who buy a trip. There should be some commercial free zones where no economic interests are allowed, including all guides.”

Another major theme in relation to Commercial Activities relates to permitted uses. Most comments on permitted uses touch on recreation within the refuge and the impacts and regulation of activities such as guided hunting, hiking, rafting, and touring. Several comments point out the importance of ensuring that all permitted uses are in line with the overall goals and purposes of the refuge and that policies and procedures should be developed to support those goals. Some people indicate that certain permitted uses may not be compatible the purposes and mandates of the refuge (i.e. competitive events, cruise ships). Many people express concern that the various permitted activities were impacting the character of the refuge, the wildlife, Native American subsistence, and opportunities for solitude.

259.6: “We encourage the Service to apply use and access limits on recreational activities to prevent overcrowding and ecosystem disruption. Recreational opportunities on the Refuge have historically been associated with a sense of solitude and adventure and an appreciation of the Refuge's wilderness values.

Allowing use to expand unrestricted will compromise recreational experiences and jeopardize the health of this fragile ecosystem.”

Many commenters feel that better tracking and monitoring of guided groups’ methods need to be implemented within the refuge, whether by a web-based process, phone, daily logs, or by mail. They feel that improved regulation would reduce impacts from air use (i.e. flight seeing, game spotting, landing), commercial hunting groups, and other permitted recreational uses. Some people recommend improved regulation on the guides themselves and the selection process, and indicate that such regulation would help to reduce impacts and conflicts. Some people oppose the concept of “designated outfitters” and feel that preference given to these groups excludes other non-guided users. Many guides express their support of increased permitting regulation and feel that such actions would enhance the experiences of clients, while minimizing impacts within the refuge.

645.20: “Consideration must be given to potential impacts to Refuge resources, subsistence users and other visitors. Accurate reporting by outfitters and the hunters that they transport must be a requirement in permit conditions. Failure to comply should be grounds to revoke the permits. The revised plan should include an assessment of what level and type of hunting activity is compatible with natural diversity, biological integrity, and environmental health purposes. Natural diversity purposes may not be met by current maximum yield goals of State hunting regulations. Goals for maintaining natural age and sex composition in wildlife populations should be developed and hunt regulations be implemented to meet these goals. The plan should also consider establishment of commercial free zones as authorized by the Service's Wilderness Stewardship Policy (610 FW 2 E) as a method of reducing pressure on Refuge resources and to resolve conflicts between various user groups.”

845.4: “You got to have really severe problems before you should be jumping in there having permit systems, having quota systems, and start -- because, you know, part of having a wild adventure out there is because you are on your own, and you didn't have the government requiring you to fill out a permit and get permissions and stuff. So I just love it the way it is now where you can fly out there, and if you screw up, you die out there, so keep it wild.”

633.4: “As a big game guide currently operating within the Arctic Refuge, I can attest to the importance and value of the qualities offered by the Refuge to my clientele. The relative chaos of commercial hunting happening on public lands due unrestricted guiding opportunity is evidence that the Refuge must continue to strictly limit the number of commercial users in order to maintain aesthetics of the experience.”

A common theme brought up regarding guided groups is the feeling that more education and involvement from refuge staff is needed with these groups regarding impact mitigation (i.e. cleanup). Several comments outline specific roles, duties, and limitations of refuge management regarding the permitting process.

318.7: “Guided hunting groups have also shown a shameful disregard for the environment with their campfire rings in tundra and litter left behind, in my experience. Creating a requirement that all visitors have some contact with Refuge staff can be seen as an educational opportunity which will enhance protection of the wilderness qualities of the Refuge.”

Many people express a general concern with the growth of permitted recreational uses (i.e. commercial rafting, hiking, etc.) and the potential impacts of these uses. Some point out examples of other refuges or parks where they felt overcrowding had contributed to the degradation of the land and its resources. Several pointed out specific areas that should be designated as commercial-free zones or walk-in no-fly hunting zones due the unique characteristics (i.e. Firth-Mancha Research Natural area).

367.19: “The plan should address over-use on river corridors by implementing limits and other measures to restore wilderness qualities. It should also be proactive in preventing crowding and disruption of wildlife everywhere in the Refuge. In areas where rationing of use is necessary, the plan should not favor commercial guiding operations over opportunities for non-guided visitors. The revised plan should consider designating the Firth – Mancha Research Natural Area as a commercial-free zone in accord with the FWS Wilderness Stewardship Policy (610 FW 2 E). Consideration should also be given to the establishment of zones where aircraft landings are restricted so that visitors will be able to experience solitude without intrusive aircraft activity. The relationship of the Service and commercial guides, air taxi operators, and visitors should maximize sharing of information regarding observation of illegal activities, environmental impacts, changes in wilderness character, habitat changes, and unusual wildlife observations. These data should be integrated into an adaptive management system that is responsive to changes that may occur in the Refuge.”

Many recommendations are given as to optimal group sizes to better manage and minimize impacts. Other recommendations are given to limit numbers of groups (especially during peak times and in popular areas like river corridors), as well as limiting base camp durations to ensure impacts are minimized.

418.5: “I think that Refuge staff should evaluate the need for limits on group sizes. With small groups, the focus is on the wilderness experience; with larger groups, the focus is often on the group itself rather than on the surroundings. I suggest that group size be limited to 8 (including one or two guides) on commercial trips; and limited to 6 on private trips. If necessary there should also be a limit on the number of commercial trips at peak times, which may be necessary to protect natural resources and wilderness values, and the wilderness quality of the visitor experience. “

Several comments indicate that quantifying user impacts and sharing of information among permitted user groups regarding observed impacts and changes within the refuge

would be an important tool in informing the CCP. Some commenters recommend monitoring concentrations of use and acceleration of users. Others call for a clearer delineation of when and where it is appropriate for commercial guiding to take place within the refuge.

457.3: “Make a sincere attempt to use as baseline values conditions that match as much as possible those in existence when the Refuge was created. Make a conscious effort to avoid using a constantly changing baseline that gradually accepts less and less wild conditions as the norm. Acceptance of that sort of changing baseline, partly due to management personnel turnover and partly due to an increased proportion of visitors with limited wild country experience, has resulted in substantial changes in Denali National Park's original component and the ‘wilderness corridor’ along the Park's road.”

645.16: “To address currently impaired wilderness character in areas of the Refuge where there is excessive public use, the revised plan must identify this situation as an priority issue and describe how it will be addressed. Components of a recreation use plan should include: objectives to be achieved, standards and indicators for measuring use and changes, monitoring protocols and schedules that can determine if standards are being met, thresholds at which management actions would be invoked, and description of the specific management actions that would be taken to achieve objectives. A recreation use plan should consider all available and pertinent information such as seasonality of use, number, location and condition of campsites and their relationship to sensitive wildlife and habitat along the river corridor. If use limits are invoked, the plan must take into account the possibility of displacement of use to other vulnerable areas, and include measures to prevent excessive use elsewhere in the Refuge.”

Several comments were received regarding the impact of permitted users on Native Alaskans. Some comment on the difficulty placed on Native American subsistence with tracking, monitoring, and permitting procedures. Others comment that increased permitting and regulations detract from the user experience within the Refuge. Some feel that guided hunting groups disregard Native American Lands. There are general comments indicating that the Service could do a better job of regulating and overseeing these guides. Some comments state that Natives don't understand the rules and regulations behind the permitting process and recommend that having a Native involved in this process could provide important insight and guidance regarding guided group practices and impacts. They also feel that Native Alaskan concerns and reports regarding impacts of permitted uses should be addressed better. Others recommend that preference be given to Native subsistence hunters over guided hunting groups.

763.9: “The oversight. Fish and Wildlife, when they give permission for hunters guide to cover a certain area, they have a poor oversight. When it's bad weather, they don't even go there, you know, or they don't go there at all. That's another thing that needs to be changed, is oversight. You make sure you watch the guys, what they -- how they operate and how many people they got in there. :”

457.3: “Permit hunting and fishing in manners consistent with the Refuge's mandate. This would seem to make even subsistence hunting with the use of snow machines and wheeled or tracked ATVs to manners, seasons, and conditions that do not result in ecological or visual damage to the vegetation, soil, or soil frost regime. I do not believe that, within the Refuge, any existing federal legislation provides carte blanche to adopt any and all new technology in the name of ‘subsistence.’”

A final theme in Commercial Activities is infrastructure and traffic. In particular, respondents discuss concerns about the potential for use of ice roads in relation to oil and gas development, and the traffic generated by helicopters and planes. Some request the banning of commercial use for tours etc. Some feel that commercial free zones would help control this kind of traffic.

515.5: “Ice roads leave scars on the ground, I have seen ice roads from the air in the summer in the western Arctic. Ice roads are not compatible with wildlife, wilderness or plant life.”

631.15: “Strict prohibition of the use of helicopters to transport tourists from cruise ships into the Refuge should be implemented before problems develop.”

450.10: “Intrusive research techniques and technologies, and helicopter use should be prohibited, except where they are truly the minimum tool necessary to administer the area as wilderness.”

645.17: “Establishment of a commercial free zone (as provided for in the Service Wilderness Stewardship Policy 601 FW 2 E) and aircraft closure for the Firth - Mancha Research Natural Area should be implemented in the plan. Together these measures would provide further protection for this special area. It would allow for opportunities for visitor to hike into the area from aircraft landing zones outside the area, and avoid encounters with low flying airplanes and parked airplanes. The plan should also study the need for such zones in other areas of the Refuge.”

Government Activities on Public Lands

Many respondents discuss the various government activities that take place in the Refuge. Comments provide insight into scientific study and monitoring, enforcement/education, funding and staffing, maintenance of infrastructure, and pursuit of alternative energy strategies.

In relation to scientific uses, including monitoring and studying, several comments were received. Many think the Refuge should not be compromised as a “natural laboratory”, and its natural scientific integrity guarded. Others elaborate on the type of research that they feel should be allowed in the Refuge.

598.2: “The opportunities for scientific study of the Refuge are also more important than recreation. Recreational use must not compromise the natural scientific laboratory. Yet scientific use must also be restricted so as not to damage the natural characteristics. (Note: I am a scientist.)”

631.16: “Intrusive research techniques and technologies, and helicopter use should be prohibited, except where they are truly the minimum tool necessary to administer the area as wilderness.”

Predator control and species management emerged as a major theme with regard to government activity. Some of these commenters want the Refuge to take a hands-off approach to wildlife management to better maintain natural cycles and a healthy ecosystem. Many commenters express strong opposition to predator control by any means, regardless of the desired outcome. Some of these commenters specifically comment on the practice of eliminating predators to increase game populations. A few commenters point out that use of predator control by the state to save and protect threatened or endangered species may be required, but urge caution.

279.2: “The plan should recognize that all indigenous animals and plants have intrinsic value in this intact community of life and must be allowed to exist in their natural diversity, with their natural cycles and interactions continuing. Thus, predator control and other means of reducing the numbers of predators and carnivores to increase the number of game animals must be prohibited.”

1167.7: “No predator control- the state of Alaska has been inflicting cruel and unusual punishment on wolves and bears for years- stop this now.”

671.3: “Untrammelled wilderness means that natural processes must be allowed to shape the ecosystem as they have for millennia. This includes predation. Predator control has no legitimate place in the Arctic National Wildlife Refuge. Please prohibit all attempts by the state of Alaska to kill wolves or other predators.”

604.5: “The CCP should include that, unless necessary to protect threatened or endangered species, predator control programs will not be implemented in the Refuge. This will help ensure that intact and healthy food webs with natural cycles and healthy ecosystems exist as part of the Refuge.”

Respondents generally agree that enforcement is lacking in terms of manpower and funding. Many commenters support this viewpoint. Airspace, ATV, poaching, and recreation, are all common areas of concern, where respondents indicate that more staffing and enforcement could be targeted. Many feel that funding and staffing need to be addressed and increased for the refuge. Many provide either support or opposition of the presence of more uniformed officers. Generally speaking, tribes support more funding and staffing within the Refuge and want to engage in cooperative education to teach and take care of the resources properly, and to promote responsible use of the land.

891.5: “So I'm just strongly stressing that the Congress stand up and put more money forward for the U.S. Fish and Wildlife and hire more people to help the Native people understand what is going on with our land....”

4943.3: “Describe issues: The refuge has an excellent opportunity to lead by example of letting what works remain working. The recent changes that we have seen, such as uniformed patrols, have not led to positive comments from our clients, but a decrease in perceived wilderness experience.”

Numerous comments support or oppose the use of structures within the Refuge. Facilities such as outhouses, ranger stations, information stations, cabins, signs, and more are discussed. Many responses indicate a strong feeling to remove all manmade objects and maintain ANWR as natural as possible.

279.9: “Administrative structures and installations should be prohibited and the cluster of unsightly buildings on the Shore of Peters Lake should be removed.”

671.6: “So called “improvements” such as cabins bridges, signs and even trails should be avoided. ANWR is simply too uniquely wild to allow these common trappings of less wild places.”

Alternative energy is an important topic to many respondents. Respondents promote solar, water, and wind power as good alternatives to petroleum. Among those who expressed an opinion, there is near consensus that these alternate forms of energy would bring new jobs and spark economic growth. Many commenters feel that alternative energy could also be a cleaner, safer way to produce energy, compared with on/off shore drilling.

1047.3: “Please keep our oceans safe - not only is Alaska being threatened but all of our oceans are now at risk with the drilling or proposed drilling. Speed up the work on getting solar and wind up-to-speed as affordable resources.... Get rid of oil in our oceans, forget nuclear which could have the same disasters, go with solar and wind – replenishable and safe.”

896.4: “We have to do our part by -- instead of using too much oil, we should start using less oil and thinking about using less oil and use other kind of energy like wind energy, small hydro, and solar energy and those things. That way they'll listen more.”

1381.8: “No more oil; no more coal. Clean energy technology and jobs now!”

Private Activities on Public Lands

A very large number of comments were received in relation to private activities on the Refuge. Some discuss the need for a visitor use survey. Many respondents provide support or opposition to recreational activities, large groups and growing crowds,

commercial versus private allotments, ideas for registration systems and leave no trace education, river launch days, and ATV and snowmobile restrictions.

Some express concern with the Refuge management postponing the Visitor Use revision until after the completion of the CCP. They feel that a Visitor Use revision should be used in conjunction with the CCP process and the information from the survey should be integrated into the process. These respondents feel that integrating current visitor feedback in the CCP is necessary to be efficient in providing opportunities for a range of recreational activities.

623.8: “Visitor Use Survey – We [State of Alaska Citizens’ Advisory Commission] recently learned that implementation of the revised visitor use survey will be delayed until after the plan revision is completed. The Service should reconsider this decision and release the visitor survey for this season so that this information can be included in the CCP revision.”

430.5: “Visitor Use Survey – The State [State of Alaska Office of Project Management and Permitting] has been supportive of the Refuge’s intent to update the 1977 Visitor Use Survey to gather information on public uses in order to inform the CCP planning process. It is our understanding implementation of the revised survey has been postponed until after the planning process is complete. Given one of the purposes of the Refuge is to provide opportunities for a range of recreational activities, we urge the Refuge to reconsider and implement the survey this summer so CCP decisions that affect public use can be made using current visitor feedback.”

Some note the impacts that large recreation crowds are having on wildlife migration patterns (and consequently subsistence). One respondent notes specifically that the growing number of visitors that watch the caribou migration is causing specific problems:

764.1: “...everybody in this town used to go up and camp up on that mountain up there because they knew that that's where the caribou was going to be. And nowadays we've got like tourists and then we've got sports hunters and everybody that travel up the main Chandalar there. And there's these little planes bringing up these rafters, hikers, every day, 24/7. After June 1st, you're going to see it again. Yeah, back in the day, you know, that's where they used to travel down and the elders would spot them on the mountains over there coming and everybody would get happy. And all the women and all the children, everybody would camp out on the mountains up there and get ready to, you know, stack our food for the winter, you know. It's pretty cold around here. And nowadays there's so much airplane activity going on that the caribou don't come down that way no more. They go around and they come out at the Wind River down here and then we get them after they're in their rut, you know, and we don't eat them when they're in their rut, you know. Then they come over from the Crow Flats and they come over this way, and this is good feeding grounds for them in the winter.”

Comments describing ideas for different registration or documentation systems for all those who visit the Refuge were common. While many felt that growing pressure from visitation must be addressed clearly, there was disagreement on whether facilities should be established to ease the effects of visitation and educate users. Suggestions for establishing daily visitor limits, registrations systems, check in desks, and education policies were common. Several respondents express the need for educating all users. Many agree that education on proper campsite locations, fire prevention, not interfering with subsistence practices, and leave no trace need to be addressed for all Refuge visitors. A repeated issue mentioned by commenters is the observation that waste and human waste increasing exponentially. Some feel that not having rangers or backcountry check-in desks is appropriate for a “wild place”, and request that the Service shouldn’t try to make the Refuge “safe” and should take a hands-off approach.

77.2: “What should Refuge do: It may become necessary to have some kind of registration system for individuals and groups who recreate in the Refuge. Along with registration there could be some education about no trace camping and about cautions to consider protecting the environment, and the wildlife.”

367.5: “The Refuge should continue its focus on providing recreational opportunities with authentic adventure, solitude, challenges, risk, and self-reliance required of all visitors. The FWS should exercise restraint in managing the Refuge, and maintain a subtle presence in the Refuge.”

718.3: “Please keep all recreational activities wild – no cabins, facilities, no airplane hunting, airboats, jetboats or helicopters. Don’t allow overuse of the river for recreational activities by controlling the number of rafting tours, etc... It is essential that this area is kept as wild, pristine and undeveloped as possible.”

Private versus commercial recreation emerged as a strong theme. Many wrote in to say private recreation should be favored over commercial recreation, and that there is a current imbalance favoring commercial guides and special permits. Others comment on how the private users are the least conscientious about their impact on the lands and should be restricted as much as commercial.

94.4: “Describe any issues - Commercial vs. private recreation – private people should have preference.”

3.3: “...By far the user groups which I’ve found contribute the worst damage to these areas is the private-unguided user followed by the guided hunters. The present management treats various user groups in an inconsistent manner which enables considerable devaluation of the wilderness. While requiring strict limits on the use patterns and numbers of guided recreational use (a good thing), management makes no similar efforts with the private users. These private users have often demonstrated an ignorance of low impact use techniques and have created repeated and accumulative problems. They have come in large high

impact groups and created accumulative effects of which they often are not aware.”

792.10: “In specific areas where the rationing of use becomes necessary, I think it's very important that care is taken not to favor commercial hunting operations or people with greater financial resources over the common American.”

Comments about increasing use on the refuge's numerous rivers brought suggestions of implementing river restrictions. Ideas include visitor limits, registration systems, calendar launch days, and limitations on campsite locations to mitigate impacts on migrating caribou and subsistence patterns. Commenters also give suggestions about which waterways need restrictions and which waterways should remain without restrictions.

365.7: “The agency should implement use limits on rivers where overuse is occurring and should be proactive in preventing crowding and disruption of wildlife everywhere. The CCP should implement group size limits of seven for backpacking groups and 10 for river floating groups.”

Many comments were written in support or opposition of certain types of recreation. Several commenters speak specifically to motorized uses within the Refuge including airboats, airplanes, and snowmobiles. Many express concern regarding the impacts of motorized vehicle use within the refuge, whether by Natives or other users. Many call for a complete ban on all motorized equipment, although some identify the need for rural access and subsistence needs. Many are concerned about air quality (pollution and noise), vegetation, and wildlife. Commenters question specific restrictions regarding subsistence versus recreational uses, and want clarification in the CCP and enforcement.

224.2: “The refuge should adopt a strict policy on motorized use, limiting access by motors and encouraging traditional uses of the land and water...”

387.12: “The promises made in ANILCA to subsistence users should be honored. This includes the use of motorized vehicles for subsistence when such use is not allowed for other purposes.”

671.8: “Motorboats, snow-machines and all other mechanized land and water vehicles should be banned from the refuge....”

864.2: “Another thing ...I'd like to bring...up again, is noise pollution with the airboats. I talked once to Woodie in Juneau about the airboats and how we can keep them from heading up this way and destroying and disrupting our places where we hunt.”

390.5: “I believe that motorized access of any kind should be strictly limited and that Refuge managers should place a high priority on enforcement. ...Clearly, human beings (and it doesn't take very many) make a mess wherever they go.

Protection of wilderness areas is best, and most easily, accomplished when access by human beings is kept at an absolute minimum.”

One of the most significant themes from comments in the “private activities” codes is Subsistence. Comments touching on subsistence are numerous with the majority discussing potential impacts on Alaska Natives, particularly Gwich’in and Inupiaq tribes, and their reliance on the resources of wilderness lands for their social, cultural and economic welfare.

Several people comment that the CCP should promote/review impacts of subsistence activities. Many feel that it is important to protect subsistence use through protecting the ecosystem and resources of the refuge. They feel it is important to understand and study the potential impacts of refuge management practices proposed in the CCP, and that greater focus on subsistence concerns should be included in the scope of the CCP (including the review of various wildlife treaties that protect habitat that subsistence lifestyles depend upon). Many Natives see the review of the CCP as an opportunity to ensure continuation of the culture of subsistence as well as the health and habitat of wildlife throughout the Refuge.

366.16: “...Section 810 of ANILCA, 16 U.S.C. 3120, requires the heads of Federal agencies to evaluate the effects of any proposed land withdrawal, reservation, lease, occupancy, use, or other disposition of Federal lands upon subsistence uses. This evaluation must include findings on three specific issues: (1) the effect on subsistence uses and needs; (2) the availability of other lands for the purpose sought to be achieved; and (3) other alternatives that would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes. Section 810 also prohibits agencies from proceeding with any proposed disposition that would significantly restrict subsistence uses, without first following certain procedures and making certain findings. The USFWS must complete such an evaluation as part of any wilderness review of lands in the Coastal Plain; if this evaluation concludes with a finding that the proposed action would result in significant restriction to subsistence uses and needs, and the USFWS wishes to proceed, the agency must initiate further procedural requirements of Section 810. As the USFWS has recognized, significant restriction to subsistence uses may occur when an action may substantially limit access by subsistence users to resources. Yet, this would be precisely the result of wilderness designation for the Coastal Plain.”

187.5: “It is my opinion that when that recognition was made in ANILCA it permitted traditional uses but it did not address the level of traditional uses. In the Arctic Refuge you could have had three snowmachiners using the Arctic Refuge for subsistence purposes, but that doesn’t necessarily translate into a thousand users. And I think that there is...a serious legal question there, it just hasn’t been brought forward yet. But I hope that the Service addresses that issue too on what is the threshold when it comes to these different types of subsistence users and because it’s become far more mechanized.”

Several recommendations are made regarding how to improve communication and information sharing between Natives and refuge management regarding subsistence practices as well as future decisions on activities within the refuge. For example:

694.15: “The federal government has a legal obligation to protect subsistence, as embodied in Title VIII of ANILCA that originates from the federal government’s trust responsibility to protect the hunting and fishing rights of Alaska’s indigenous peoples. The Service needs to address subsistence uses and how the agency will protect those uses in the Arctic Refuge CCP revision DEIS. In addressing subsistence needs and activities, the Service should identify the scope of subsistence education and outreach components it intends to pursue necessary to meet the agency’s legal requirements to protect subsistence activities. Included in this should be electronic tools, such as websites and other community needs, and continued support for traditional knowledge and science camps in the Arctic Refuge.”

Many comments refer to the ANILCA requirements to protect subsistence activities – and many express a strong desire that those protective policies be upheld. Some add that subsistence should only be protected as long as it is done in a sustainable manner and does not compromise wilderness and wildlife. Others dispute the interpretation of these protection ideas, especially regarding motorized travel and construction of cabins. Many view new technologies used in subsistence activities as potentially harmful to wildlife and vegetation, especially in light of growing Native populations. Many Natives express that new technologies were necessary to continue subsistence to compete with other users. Others point to the rights bestowed upon the Natives through the Alaska Native Claims Settlement Act to use the resources of the land to provide economic independence, for which they felt wilderness designation would not allow. There was also discussion on the cumulative impacts of continuous development pressure faced in the refuge and its effects on Natives – as outlined in a National Resource Council (NRC) study. Some express the need for better clarification and interpretation of the various acts and policies that affect Native Alaskan subsistence and that the impacts or consequences of these policies be studied in the CCP.

379.16: “The CCP should include provisions for continued subsistence use of the arctic refuge. Subsistence harvest rights for Alaska Natives and rural Alaskans are protected under ANILCA, which mandates that the Refuge be managed to “provide...for continued subsistence uses by local residents,” consistent with the conservation of fish and wildlife populations and habitats, as well as fulfillment of international fish and wildlife treaty obligations. Defenders recognizes and fully supports subsistence use and accepted traditional harvest practices for federally qualified subsistence users. The plan must clearly outline how harvest rights of federally qualified subsistence users will be preserved into the future, while assuring the protection and long-term viability and diversity of wildlife and their associated habitats within the Refuge.”

260.2: “For over 10,000 years, Native peoples have utilized resources present in the Arctic Refuge for sustenance and to generate revenues vital for public services. The Alaska Native Claims Settlement Act of 1971 endowed the rights for surface and subsurface development to indigenous populations with the intent to instill economic independence. Under this authority Native populations have developed ecologically sound and culturally distinctive practices that have ensured the sustainability of their culture and local wildlife.”

12.3: “ANWR also should continue to be maintained as an undeveloped site. A 2003 National Research Council (NRC) report noted that ‘...Continued expansion is certain to exacerbate some existing effects and to generate new ones...’ Expansion of development will bring an increased human population into the region, and with it will come increased petrochemical toxins, vehicular and maritime traffic, noise, air and water pollution, soil disturbance, and species introductions. What the effects of all of these factors might be are unknown because a great deal of uncertainty exists about the potential repercussions of development; however, they will be significant. Because of the uncertainty, it will be difficult to develop an environmental mitigation plan that can effectively address potential changes. Further, the habitat fragmentation that will come from increasing roads and infrastructure is known to play a significant role in blocking gene flow and disrupting migration patterns of many species, including some of the species such as the Porcupine caribou herd and peregrine falcons designated for protection in the ANICLA. To successfully conserve these and other species as they are now, as well as prepare for eventual range shifts due to climate change in the future, large, intact ecosystems must be maintained.”

399.17: “The NRC study recognized the cumulative impacts faced by the Gwich’in people from the ongoing threat of oil and gas development in the refuge: ‘The Gwich’in believe that oil and gas-related activities there [in the coastal plain 1002 area of the Arctic National Wildlife Refuge] would affect the reproductive potential and migration patterns of the Porcupine Caribou herd and as a result threaten their way of life. As with the Inupiaq concerns about offshore development, the beliefs are intense and widespread and themselves constitute a continuing effect that is exacerbated by the past and current political debate over development in the Arctic National Wildlife Refuge... The threats accumulate because there have been repeated attempts to develop the area and there is continuing pressure to do so.’ (p.156). Therefore wilderness designation for the coastal plain would be a major advantage to the Gwich’in people and the subsistence resources we depend on. It would provide implementation of refuge management that fully supports the refuge purposes especially subsistence.”

Some support/oppose restrictions and regulations that may result from wilderness designation, and feel that such regulation would affect subsistence activities by Natives. For example:

359.4: “We are also concerned that wilderness reviews and designations will not account for the reliance Native populations have on the land, no take into consideration the tremendous economic potential the Refuge holds. For more than 10,000 years, Natives have relied on the natural resources present in the Refuge to provide sustenance and to preserve a centuries-old way of life. Indigenous populations, particularly the Inupiat of the North Slope Borough, have developed ecologically-sensitive and culturally-distinctive practices that have helped ensure that sustainability of local wildlife. Restricting or regulating their use of the land for fishing and hunting jeopardizes their livelihood and imperils their culture.”

Where permits are required, some recommend a streamlined process for Natives. Several Natives express concerns about reduction in the areas designated for subsistence hunting and suggest that certain areas be set aside for the sole purpose of subsistence, without regulation. On the other hand, many feel that wilderness designation would enhance protection and management of subsistence resources. Others feel it is important to study the economic benefits of development within the refuge and weigh that with possible compensation to Natives to help maintain and protect the character of the land

85.2: “The Refuge staff should encourage legitimate subsistence uses, including cabin building, within the Refuge, subject to reasonable measures. While there is a permitting process in place, it should be streamlined, especially to allow new generations to get in. The Refuge staff should simply follow the law and allow for the continued opportunity for subsistence living in the Refuge.”

887.14: “They don't like people to prevent them from doing anything on their land. Fish, meat, sheep. They don't want any regulations preventing them from hunting any of that. The old people would like to be able to do that as long as they can. Kaka is the one that -- Carl Brower is the one that always hunts for the elders. When he goes up, he always shares the sheep in the winter when he can go up. The regulations are coming big time. He thinks that regulations are coming. That anything is being -- we can withstand your regulations. We can take it. We can withstand your regulations he says. We can live with them.”

There were numerous discussions of the history and religion of Alaska Natives with regard to subsistence activities. The relationship between the natives and the wildlife (particularly Porcupine Caribou) is an important part of this history, and some Natives see themselves as stewards and protectors of the wildlife with which they cohabitate the land. Several Natives comment on the impacts of development activities, increased usage (i.e. sport hunting) within the refuge, and even the impacts of invasive species on subsistence resources. They comment on noticeable changes in wildlife behavior and health and the effects of such changes on their subsistence. Examples of effects discussed are safety risks (having to travel further to find food), contamination of food and water sources, and mental health. On the other hand, several Natives mentioned no noticeable changes in subsistence resources.

Many feel it is important to monitor population levels of the wildlife that Natives depend on for subsistence as well as to implement management strategies that maintain healthy wildlife populations. Some feel that such strategies and management should be implemented or informed by Natives, while others feel that Refuge staff informed by environmental experts would be better suited to carry out these management strategies.

890.2: "...They said they shoot too much moose, the hunters. That was one of the complaints in Fort Yukon, too much sport hunting, not bringing back meat, just trophy. That was one of their reasons. Arctic Village, one of the reasons is too much traffic through Arctic Village bad. How many people use this land? Because, see, (indiscernible) it belong to American. It belongs to the public and they say it's public. Anybody could speak on that, not only us. We're -- you know, it belongs to the whole American."

188.1: "Back in the early 70s when the whalers were stopped for whaling because of the bowhead whales supposedly being completely depleted and we were stopped by wildlife conservationists, stopping—telling our government to stop our subsistence activities. That was part of the deterioration of our culture and that is witnessed by very high suicide rates. My God, Mayor Mystrom knows what I'm talking about when I'm talking about suicide rates. Our subsistence activities and Inupiaq science has been vindicated by Dr. Albert up in the North Slope who kindly stayed with us for almost four decades, three and a half decades to be exact, proves that Inupiaq science is actually a PhD science, credibility of our Inupiaq elders, and you're looking at a person speaking that has close to 150 years worth of Inupiaq science that was vindicated by Dr. Albert's studies of our elders and of our environment. The offshore development that is going on just completely would ruin the onshore nesting/calving areas of—nobody's going to want to go to ANWR and there will be no wildlife with offshore development. Let me tell you that. That's inevitable if you let offshore development happen."

Private aviation (use of personal aircraft) is another major theme in the comments. Respondents that express concern with private aviation had strong feelings about the increased use of planes in the refuge. Many commented that spotting game from aircraft and low flying action photography should be prohibited. Many commenters voiced their concern for the places that these planes land, and how harmful it can be to the vegetation. Others think it would be good to designate durable landing zones in order to protect the tundra. Some suggest that the use of twin engine aircraft, helicopter flights from tour boats, and jet airplanes cause excessive noise that disturbs the Refuge users and wildlife.

1373.11: "The use of aircraft should be restricted, with designated landing zones maintained to limit the noise and disruption of airplanes to the sensitive ecosystems and wildlife on the tundra. I urge you to strictly forbid the use of aircraft for hunting or for viewing wildlife."

491.5: “Airplanes should be permitted to land for access, but should not be allowed for game spotting, and should be discouraged for flight-seeing. Airboats, jet boats and helicopters should not be allowed for public access.” Majority of comments agreed that air and landing strip access was necessary and many agreed that with proper limitation on landing areas and wildlife considerations there would be responsible access.”

711.2: “I urge that the revised plan address the airstrip issue by embarking on a regulatory process, which adopts adequate restrictions to allow impacted areas to heal, and prevents new impacts from occurring. This will not result in denying access to the Refuge. Landing of airplanes on durable surfaces such as gravel bars along rivers, barren rock ridges, snow surfaces with ski planes, or on water with float planes will be allowed to continue, and will provide reasonable access without causing serious impacts.”

Private property ownership issues also emerged. Several respondents recommend the CCP explore a process of purchasing/selling inholdings to preserve wilderness. Some feel this should be a high priority, as many express concern regarding potential impacts from private landowners (i.e. “reasonable access” issues). Others feel that Native allotments should be prevented from being sold altogether, or that mechanisms should be installed to allow either Native Tribes or Refuge management to have priority over other potential buyers. Some oppose such regulation or interference in private inholdings.

367.37: “The revised plan should encourage cooperative efforts for natural resource conservation between the Service and adjacent tribal and private land owners and inholders. Such efforts should include information regarding Service land acquisition policies and practices. Where it is essential to assure maintaining the integrity of Refuge values, the Service should set a high priority on the purchase of private inholdings from willing sellers. In cases where owners want to retain ownership and traditional uses, but also wish the land to remain protected from development that would be harmful to the Refuge, conservation easements should be considered.”

385.13: “There is a very real fear that Native allotments located within the Arctic Refuge will be sold and transformed into private inholdings that are then developed into commercial hunting lodges, ecotourism lodges, etc. This will be tragic; it is imperative that the Fish and Wildlife Service begin a process of cataloging these inholdings and offering to buy out willing sellers at a fair market price. The prospect of a Gaedeke Lake-type lodge or Princess Lodge on any of the Native allotments within the Arctic Refuge is chilling, and needs to be avoided at all cost. Particularly if there is an opportunity to purchase land outright or to purchase development rights, these steps should go forward so that surrounding lands may be considered for wilderness designation.”

821.3: “...I feel that the village of Kaktovik should decide what they want to do on their own land. That is their own land. They should decide. Not the Federal

Wildlife Service should decide. Not nobody. I mean, like, for Arctic Village, Doyon, they decide for their own lands what they want to do. Everybody is created different, and they live in different ways. So that is why that is important that we need to -- what Congress has set aside for the villages to express themselves their rights of what the law tells them that they can do, to express that, because that is their land, that is their own backyard. They should decide what they want to do for themselves..."

784.2: "...have local people -- local tribal governments create a trust to buy [the allotment] for tribal use or something, tribal ownership, and we need help like that. Or an endowment or something to keep it going so we'll have these places -- we'll have a tie to these places and still be there and it'll be a way to voice our voice. And they always seem to say that we have to use that allotment; you don't go there."

A few comments express concerns over the history of land exchanges, and consistency of land exchanges with the goals and purposes of the Refuge.

367.47: "The history of land exchanges involving conservation system units in Alaska is checkered with impropriety. The plan should prohibit any land exchanges or conveyances that would remove public lands or interests in lands (surface or subsurface) from the Arctic National Wildlife Refuge. Land exchanges that are for non-Refuge purposes, that are not in the public interest for meeting Arctic Refuge purposes, or that are for the primary benefit of corporate landowners should not be considered. Past land exchanges involving the Refuge, and others that were eventually dropped, were not in the public interest, ran counter to the Refuge's wildlife, wilderness, and other purposes, and were a backdoor way of increasing the pressure for oil and gas development on Refuge lands. These land exchanges introduced significant conflicts over Refuge management and should not be allowed in the future as they frustrate rather than enhance Refuge management. The secretive nature of land exchange negotiations and drafting of agreements fails to provide adequate daylight necessary to fully address public concerns and issues. Without systematic criteria, standards, and regulatory provisions in place governing land exchanges on refuges in Alaska, they should not be considered."

A final theme in the Private activities comments is hunting and trapping. Respondents both support and oppose hunting and trapping within the refuge. Common themes include subsistence, sport, and fair chase hunting. Subsistence hunters often express issues with sport hunters. Many voice concerns about sport hunters not using the meat, and just taking the antlers. Other commenters voice concerns about increased restrictions to hunters.

84.1: "[The CCP should] ensure trapping, hunting, and fishing rights are always there for rural and non-rural people."

735.1: “I am very concerned about hunters who come into our country to hunt, and only take the antlers and leave the meat behind to rot... Sometimes they even hunt on our land... These needs to be a way to stop this. This plan is to protect special values includes subsistence and Native culture...”

874.4: “They're imposing too many laws for these Native people. Hunting. I've got to pay to hunt right now. I have to pay to go hunting. I have to buy duck stamp, bullets, duck license. Way back with my father, it wasn't like that...”

Tribal Activities

Most comments regarding Tribal activities focus on potential impacts of Refuge regulations and policies to Native Alaskans. Several comments outline the history and culture of the indigenous tribes (particularly Gwich'in and Inupiaq) and request that such traditions be respected and addressed in the CCP. There are various comments on tribal duties and obligations to protect lands that are sacred. These comments allude to tribal gatherings where such concerns have been discussed.

448.3: “For untold thousands of years, the lands and waters now in the Arctic Refuge nurtured and sustained indigenous people. This special cultural relationship depends on the natural ecosystems within the Refuge and the Plan must safeguard opportunities for subsistence use according to the Alaska National Interest Lands Conservation Act and conservation principles. The Gwich'in people have lived in the region for thousands of years, and regard the coastal plain as ‘The Sacred Place Where Life Begins’ because it has been the most frequently used birthing and nursery grounds for the migratory Porcupine Caribou Herd on which the social, economic, and spiritual fabric of their lives depends.”

Many are concerned about protecting their rights under ANCSA, some pointing out that Native Alaskan hunting methods are sustainable and support the rights outlined in the Act, and others stressing that wilderness designation would have negative impacts on tribal activities.

664.3 : “Reports have shown that there is no viable reasons to revoke the legal rights the Inupuits were granted under ANCSA to hunt, fish or responsibly develop the 40 million acres provided to them. And that those activities have had, and will not have any negative impact on protected species in the area such as the polar bear population.”

378.3: “Consider that restricting access to ANWR's oil and gas resources would injure Alaska Native village and regional corporations created under the Alaska Native Claims Settlement Act (ANCSA) of 1971, which would create negative effects on America's economy and handful impacts for all of Alaska's citizens. Indigenous people, particularly the Inupiat of the North Slope Borough, rely not only on wildlife for sustenance, but also on local oil and gas production for revenues. The Alaska Native Claims Settlement Act endowed the Native

populations with the rights to surface and subsurface development with the objective that these populations could remain economically independent.”

Comments regarding heritage are varied, as commenters have broad view of which topics relate to heritage concerns. Many express support of initiatives and policies that promote preservation of the long-standing Native Alaskan heritage, culture, and tradition. Several comment on the general history and way of life on tribal lands. Some Natives are concerned with the adverse effects of development pressures and integration of modern ways of life on their heritage and traditions. They also express a general concern for the perpetuation of traditions and knowledge.

788.5: “And that's the thing that we want to state, that the outside force is always telling us who -- what we can do and what we can't do. And that's wrong. Because as our history states, is this is who we are, our land from the ocean to the Brooks Range. Ask any Inupiat within that area, the North Slope area, and this is, as I stated, are known that we fought for this land, too, with the Indians. I know with the caribous, they keep coming up with the Indians. Well, they lost the war. We won the war, and this is our land, so just to note that.”

399.16: “In addition to stress contributing to adverse health effects, oil development has increased the smog and haze near some villages, which residents believe is causing an increase in asthma. The stress of integrating a new way of life with generations of traditional teachings has increased alcoholism, drug abuse, and child abuse. Higher consumption of non-subsistence food...has increased the incidence of diabetes.”

875.8: “We have to talk with our kids to ask them to step forward, too, when the - their time will come for them to speak on our behalf. And as we talk about elders, losing our elders, we're losing a lot of knowledge, we're losing a lot of strength, but it's not that we're going to lose anything when we start teaching our kids, talking to our kids, educating them, letting them know what's ahead of them because they, too, will stand to lose a lot if they don't step forward and step up to the plate to really get involved in these meetings especially when it has, like I said, a direct impact on them as residents.”

A number of comments regarding cultural and sacred aspects of Native life were received. Most refer to sacred lands and the unique aspects and significance of these lands. Several people express support or opposition for wilderness designation as a protection of these lands.

396.7: “The Gwich'in people have lived in the Arctic region for thousands of years, and regard the Coastal Plain as “The Sacred Place Where Life Begins” because it has been the most frequently used birthing and nursery grounds for the migratory Porcupine Caribou Herd. The social, economic and spiritual fabric of the Gwich'in culture depend on the survival of these caribou. The CCP should

strive to preserve the wildlife, wilderness and subsistence values necessary to maintain the Gwich'in way of life for many generations to come.”

664.1: “When it comes to balancing responsible usage of our environment and resources with complete dedication to preservation and protection of our ecosystem, cultures like the Inupiat people of the North Slope Borough are beyond reproach. Now as your department begins work on a new Comprehensive Conservation Plan, I was shocked and very dismayed to hear that our government is considering re-designating large parts of the Inupiat legally protected lands as protected wilderness.”

Many commenters stress the importance of understanding and protecting cultural and sacred resources through regulated processes (e.g., NEPA) as well as gathering specific information from the tribes themselves. Some of these commenters wanted the CCP to outline specific methodologies for information gathering and protection. Many commenters express the opinion that the Service should be careful to listen and incorporate Native concerns into all plans and policies that affect the Refuge and Native lands in the region.

627.16: “The NEPA regulations, at 40 CFR 1508.27(b) (3) and (8), require that effects on historic properties and cultural resources be considered in judging the significance of environmental impacts. A variety of specific federal laws, as well as the laws of many states, Indian tribes, and other jurisdictions and a number of international conventions and recommendations, apply to the management of impacts on different kinds of historic properties and cultural resources, such as: historic buildings, structures, sites, districts, and landscapes; religious practices, beliefs, and places; traditional uses of land and resources; ancestral human remains and burial sites; and traditional ways of life.”

367.42: “FWS should address cultural, historical and archeological information in the CCP, and develop it in partnership with tribes and local communities. This should include projects that involve oral histories and expertise from elders, and culture and science camps for youth. Traditional ecological and local knowledge should be incorporated into the CCP. There is considerable new information in books, articles, websites, and so on, about cultural, historical, anthropological and archeological resources.”

815.1: “We need to stop, look, and listen to the people here, especially the Native people of Alaska. They depend on the caribou herd that migrates on both sides from Canada and Alaska. The resources that we have will not compare to the money that we will receive. We cannot drink oil, but the food that we pick from the land is very important to us, the salmon that comes up on the Yukon River. Now we lie managed by that. We're, I'll say, regulated. Everything that we do is regulated. We need to kind of step back and let the Native people say, hey, this is our resources here, let's utilize this here for the Native people. I worked out of the union hall for over 30 years. I understand that people need work, but the Native

people here in the Interior, the Army, up in Arctic Village, up over in Old Crow, Canada, Fort Yukon, Chalkyitsik, Venetie, the caribou herd that migrates on both sides of the country here is very important to the Gwich'in people. I can't really express the feeling I have for the impact that it will have on the Native people. If you were to travel to Arctic Village, it's a very small village up in the Brooks Range. They live a very simple lifestyle, but the animal that they harvest from that little caribou herd is very important to their culture. You'll have to remember that...And we need -- like I said, we need to stop, look, and listen to the Native people of Alaska.”

5.0 Land and Resource Management

The value and importance of various activities on Refuge lands emerged as a key theme. Comments related to activities on Refuge lands included commercial, government, and private activities. The primary focal areas of comment include discussions about Refuge purpose and mandates, Wilderness designation, and Refuge management and goals.

Refuge Purposes and Mandates

Commenters provide many suggestions regarding the Refuge's purposes. Most of the comments received in relation to general Refuge purposes and mandates ask that the Service avoid changing or manipulating the natural environment in the Refuge. Several want to make sure that the opportunity for authentic adventure stays at the top of the list. Some praise the refuge staff for their commitment and efforts. Many other commenters want to keep further wilderness designation out of the refuge. Many of the comments are a bullet point list of common items they would like to see implemented which are extensively covered in other sections of this report including support or opposition of oil and gas, subsistence, wildlife protection, recreation, climate change, and economics.

477.2: "What should Refuge do: Continue to conduct field studies, wildlife surveys and continue to promote recreation via already-established hiking trails and possible backcountry camping regulations. Enforce the requirement of backcountry camping permits and group size."

234.1: "What is important: ANWR is the most complete representation of an intact ecosystem in the US today. Maintaining that should be the goal of the management plan."

630.4: "The plan should also address the management of recreation, research, and educational opportunities that enable visitors to the Refuge to experience authentic adventure, exploration, and solitude while also providing for the long-term health of wildlife populations and habitats."

472.3: "Any activity – research, hunting, or subsistence – be kept to the least possible impact on the land itself, while understanding that these activities will continue."

638.5: "With regard to ANWR (and other areas like northeast NPRA), I think we can manage new oil fields with success similar to that at Prudhoe Bay. With new directional drilling technology, we can situate the drilling and processing equipment to avoid certain areas, and limit particularly loud or distracting activity to times other than the calving season. Ice roads are built to operate in the winter and few caribou are on the coastal plain of ANWR in the winter."

258.7: "Americans do not have to choose between developments of valuable energy resources or the protection of Arctic species and the habitat, on which these species live, feed, breathe, rear their young, and migrate. The Service's management objective to sustain the fish and wildlife species and their habitat in

the Refuge can be achieved without designation of the Coastal Plain as wilderness. This is consistent with the ability of the Service has demonstrated throughout the country to carry out the stewardship of the fish and wildlife species on other refuge units it administers independent of wilderness designations.”

Refuge Goals

Commenters identify several possible future goals for the refuge, including monitoring climate change, recreation management, and designation of land. Some made specific requests about enlarging the size of the Refuge, or making it into a National Monument. However, most echo the common themes of protection and preservation for future generations and for scientific, wildlife, recreational, and ecological purposes. Many commenters agree that the time has come to revisit the CCP, and most that commented on the topic generally support the CCP revision process. Many of these commenters are supportive of the goals set forth by the Refuge staff, and encourage the staff to include wild and scenic rivers and wilderness review for analysis. Relatively few commenters give specific detail about the draft goals which they approve or disapprove of.

755.1: “I wanted to say I am extremely supportive of the CCP process that the Fish & Wildlife Service is undertaking, and I strongly support the effort to update the conservation plan for the Arctic National Wildlife Refuge.”

462: “What is important: I think that maintaining the exemplary wilderness and wildlife qualities of the Refuge should be the top priority in developing the revised CCP. I believe that the stewardship draft goals published in the April 2010 Planning Update are well thought-out and provide a good framework for developing the revised CCP.”

481.4: “What solutions: Don't create an entirely new set of regulations, but operate within existing permitting processes on both state and federal levels. Duplicity may create government jobs, but it does not create a real economy.”

498.1: “What is important: The most important part of the draft goals are that the refuge be preserved in as much of a natural state as possible, that access for Native peoples be maintained, and that all fish and wildlife be preserved. Draft goals # 2 and 3 adequately reflect this. ANWR represents a living legacy of wildness for our country that cannot be replaced if it becomes damaged.”

373.2: “The Borough agrees with the FWS that the agency does not have the authority to decide whether any lands within ANWR should be opened to oil and gas leasing. We therefore appreciate that the FWS will not consider or respond to comments on that issue during this planning effort. That being said, the agency must recognize that any designation of lands within the 1002 area of ANWR as wilderness that occurs as a result of this CCP revision will effectively foreclose those lands from being opened to oil and gas leasing. Beyond the oil and gas

question, for our community of Kaktovik to find itself surrounded by designated wilderness would severely limit options for its future economic development.”

491.6: “The plan should focus on the special value of the Arctic National Wildlife Refuge’s undisturbed ecosystems for studying and understanding effects of climate change in the Arctic. Scientific activities must remain unobtrusive, avoid disturbing wildlife and not allow habitat manipulation. The plan must protect the integrity of the Refuge from extra impacts due to anticipated increased shipping and cruise ship use on Alaska’s north coast as Arctic seas warm.”

473.1: “Preservation of the unique wilderness, the varied plants and wildlife, a wilderness recreational opportunity, and subsistence livelihood for indigenous populations is most important to me. The draft goals for Refuge planning should ensure the maintenance of the Arctic Refuge as a wild place. The reviews should ensure protection and perpetuation of the Refuge’s wilderness qualities and recommend wilderness designation for those areas that are suitable but not currently designated.”

Many commenters discussed various viewpoints on climate change as it relates to Refuge management and inclusion as a formal goal in the CCP. While a few people indicated opposition toward using climate change as a goal, most commenters providing input on the topic supported the idea, and asked that specific items be observed in undertaking that analysis.

46.3: “Describe issues: Drilling for oil and gas is the number one issue. Increased recreational use, both permitted and illegal, is another major issue. Climate change will be a major factor in the future contributing to changes in habitat, and thus be an opportunity to study and hopefully, formulate policies that can address the changes.”

507.5: “Other thoughts: I would love to see more money spent on arctic research related to the effects of climate change and oil development. Let’s stick to the original plan to protect this unique corner of the world and try to learn more about it!”

100.2: “What should refuge staff do? Keep studying and monitoring the ecosystem for climate change indication.”

357.6: “The CCP should detail the threats of climate change to the ecosystem and the refuge wildlife. This analysis should include a recommendation to eliminate and/or minimize human-made stressors that would accelerate threats to the refuge ecosystem.”

647.8: “The CCP Should Include Climate Change Information in Environmental Education Programs - Environmental education and interpretation are priority public uses of the Refuge System and, when compatible, support the Refuge

System's mission by building public understanding and support for wildlife conservation. According to the FWS Service Manual, recreational uses should provide “an opportunity to make visitors aware of resource issues, management plans, and how the refuge contributes to the Refuge System and Service mission.” In its education and interpretation programs and materials, the Arctic Refuge should incorporate information about how climate change is altering the local ecosystem, as well as the national and global implications of those Refuge-scale impacts. The Service is well positioned to educate and inform the visiting public about the climate-driven changes impacting the Refuge and its wildlife, and measures the public can take to help protect them. The Service should develop brochures, interpretive panels, websites, and educational programs that address the vulnerabilities of Refuge resources to climate change.”

Refuge Management Policy

Respondents discuss many different aspects of refuge management policy. This was a focal area of comment, garnering nearly 200 discrete comments. Some specific requests were received, asking (for example) that the Service clarify issues such as unclear policy, refuge demarcation, and the mechanisms incorporated for periodic revision of the CCP. However, the key themes of concern in refuge management policy are climate change, and monitoring, recreation, wildlife, and land designation focused on ecosystem protection.

650.6: “We [The Wildlife Society] note the current CCP for the Arctic Refuge was adopted in 1988 and has not been revised since. Therefore, we think it’s important that a mechanism for periodic revision be incorporated in the Plan and that reviews occur at least every 15 years as mandated by the National Wildlife Refuge System Improvement Act of 1997. The Wildlife Society fully supports a review and revision of the Arctic Refuge CCP, wishes you the best during the process, and looks forward to reviewing the draft plan.”

304.10: “Effects of climate change on Refuge resources are evaluated through research and monitoring, and are considered when making management decisions, which may range from allowing ecosystem to adapt and evolve without intervention, to active management of species and habitats.”

243.2: “The Refuge should also be managed in a way that safeguards the natural biodiversity and processes of the ecosystem as a whole. This will ensure the unique wildlife, wilderness, and subsistence values of the Refuge are protected now and for future generations.”

390.4: “In reading the booklet provided for the public titled Arctic National Wildlife Refuge: Planning for its Future, it would be difficult to argue with the “Draft goals for stewardship” (pg. 5). Indeed, these goals coincide perfectly with my own view of an appropriate management strategy. That said, as the years go by, Refuge managers will, no doubt, find themselves challenged by the desire of user groups to “consume” more of the Refuge’s natural resources through

increased river and air travel, more subsistence use and, of course, pressure to open the 1002.”

303.6: “The Refuge should continue its focus on providing recreational opportunities with authentic adventure, solitude, challenges, risk, and self-reliance required of all visitors. The FWS should exercise restraint in managing the Refuge, and maintain a subtle presence in the Refuge.”

318.9: “Amid all the political rhetoric, please always remember it's a REFUGE for wildlife and a wild ecosystem. The place should be managed toward this original purpose, not be considered for petroleum development. Thank you for your hard work and for taking comments.”

Wilderness Designation

Wilderness was one of the most significant themes of comment. Wilderness commenters both support and oppose new wilderness designation (very often in the 1002 Area). The body of Wilderness comment contained many rationales to support respondents' positions. Among these rationales, commenters cite subsistence/Native concerns, Socioeconomics, wildlife habitat, ecosystem effects, and climate change.

Comments relating to subsistence and Native concerns included both supporting and opposing viewpoints in relation to Wilderness designation. Some discuss the need to provide for the tribes and Native residents, stating that years of Service regulations have affected their way of life. Many respondents call for protection of subsistence as a way of life, and to guarantee that there is wildlife to subsist on for generations to come. Others want less restriction so that they can have access to the lands and oil underneath.

753.1: “I am here today to speak out against designating the Arctic Coastal Plain of ANWR as wilderness. Today I would like to speak as an Inupiaq, not just an Alaskan. I feel that designating the 10-02 area as wilderness would be of great detriment to all of the Inupiaq people of the North Slope. The American government has had their hands around the Alaska Native's air supply for many years, and designating the 10-02 area as wilderness will only tighten their grip, further constricting the growth of our cultures, specifically the Inupiaq.”

30.1: “I am Gwich'in from Gwichyaa Zhee (Fort Yukon, Alaska). I have lived here all of my life and have three children that I have raised primarily with a subsistence lifestyle. I estimate about 80 to 90% of our food that we consume is subsistence foods that my ancestors have lived off of for years and years. I am asking that the Porcupine Caribou Herd's calving and nursing grounds/coastal plain be designated as Wilderness. It is imperative that we safeguard the ANWR and the integrity of the ecosystem of the Refuge through proper stewardship.”

768.7: “The climates have changed, too. And I'm afraid. I hope the Porcupine Caribou Herd never changes. As a people, my people of Arctic Village, we want to consider this 10-02 as a wilderness and I hope you all agree for it.”

Many commenters identify the socioeconomic values of Alaska and discuss the ways that Wilderness designations may affect the economy. Some of these commenters oppose wilderness, using reasoning that includes potential effects to access, rural resident needs, and wildlife. Many of these commenters feel that there are already enough wildernesses in Alaska and express that they feel they are being restricted by government action that will affect their ability to provide for themselves and their families.

355.8: “The members of the Alaska State Chamber of Commerce strongly oppose designation of additional Wilderness on ANWR’s coastal plain. We urge the Service to manage the 1002 area in a manner, which preserves the option of responsible oil and gas development in the future and opposing new Wilderness designations in ANWR. It is vital that the Service and the Obama Administration know how strongly Alaskans believe that ANWR’s coastal plain is critical to Alaska’s future economy and the nation’s energy security.”

76.1: “What is important: The most important aspect of the Refuge is that no changes to its plan be made. The 1002 area was excluded from Wilderness in the past, to provide Alaska with the opportunity to support itself, rather than depend on the Federal Government for handouts, welfare and bail-outs.”

Those that support wilderness designation often use rationales such as subsistence, wildlife, and future generations. Some support wilderness designation, feeling that creating and maintaining the refuge may mitigate climate change effecting wildlife populations and reproduction.

29.2: “Wilderness protection of the entire coastal plain (1002 area) and for all non-designated lands is important for the natives who call it home, citizens like me who seek the delights and lessons of wilderness, but most of all to the integrity and biodiversity of our planet earth.”

399.1: “We strongly recommend the Coastal Plan be proposed Wilderness designation to protect the caribou and the Gwich’in way of life for future generations. We also support wilderness review for the Coastal Plan and for all Arctic Refuge lands not yet designated as wilderness.”

662.1: “I can only look around and see worry on everyone’s faces. Devastating climate change is altering our fragile Arctic now...Protecting our Arctic with wilderness protections is the only way to ensure we are doing all we can to curb our human impact on our state.”

Wild & Scenic River Designation

The majority of comments regarding Wild and Scenic Rivers express either support or opposition for the study of specific rivers to designate as part of the Wild and Scenic River System. Several comments refer to personal experiences on specific rivers and

point out particular characteristics as reasons why such rivers should or should not be considered as a Wild and Scenic River.

Comments opposing designation say that rivers within the refuge receive adequate protection under refuge mandates and policies. Many commenters indicate that the focus for Wild and Scenic River designation should be on rivers within the non-wilderness (non-protected) portions of the refuge. Others indicate designations could impact Native American subsistence. A few comments were made regarding legal authority to regulate or manage uplands within the river corridors. For example:

430.4: “We understand the Refuge intends to evaluate numerous rivers within Refuge boundaries to determine eligibility for designation into the Wild and Scenic River System. The State remains strongly opposed to new recommendations for wild and scenic rivers. The Refuge already includes three designated wild and scenic rivers. Similar to our concerns regarding wilderness, we consider additional designations excessive and unnecessary as Refuge management already provides adequate resource protection to the river corridors.”

623.6: “The Commission is also opposed to studies and/or recommendations for additional wild and scenic rivers within the Arctic Refuge. As we have stated above on the wilderness study issue, existing statutory and regulatory authorities are more than adequate to protect all rivers and water within the refuge. In fact, one of the purposes of the refuge is to ensure “water quality and necessary water quantity within the refuge.” We see no need to conduct wild and scenic river studies that will divert staff resources from other management issues.”

Comments supporting Wild and Scenic River designation point out unique characteristics of specific rivers (e.g., Ramparts of Porcupine River) as well as the wildlife supported by the river systems, and recommend that the CCP outline protection measures for WSR characteristics and values, especially those threatened with increased use or development. Several other characteristics ranging from cultural and historical significance to bioacoustics of specific rivers were specified as criteria for designation. Many commenters recommend an inventory of all rivers within the refuge to identify unique characteristics and values as well as published methods and selection criteria for determining Wild and Scenic River designation.

304.19: “The CCP must ensure protection and perpetuation of the Refuge’s wilderness character. The CCP must protect the outstanding remarkable values of designated wild rivers. Wilderness reviews and recommendations for all non-designated lands should be incorporated in the CCP. The CCP should recommend wilderness designation for those areas that are not currently designated by Congress. The USFWS should implement use limits on rivers where overuse may be occurring. The USFWS should conduct a suitability review of the 24 identified rivers, especially for the Hulahula and Kongakut Rivers for wild river designation could aid in protecting river values. In general,

the USFWS should recommend to Congress wild river designation for those rivers where user capacities and developments are concerns.”

319.7: “I have hiked and floated in the Hulahula and Kongakut River watersheds, and each of those clearly qualifies for both Wilderness and Wild and Scenic River status and should be so designated. Those are the two major rivers on the north slope of the Refuge flowing from deep in the Brooks Range to the Beaufort Sea, and they are both major corridors for caribou migration. Both watersheds support an abundance of wildlife, and Arctic Char runs - especially on the Kongakut - are remarkable. In addition to the extensive wildlife found along each of these rivers, each river flows through a spectacular valley framed with overwhelming beauty. Each of the watersheds is very different, and both should be protected under these Acts.”

375.11: “As part of the scope of the CCP revision, FWS should thus complete an inventory of the rivers of the Refuge, identify their special values and character, and determine their eligibility for Wild and Scenic River designation. This effort should include those rivers not currently in designated Wilderness. We also urge the Service to include recommendations for Wild and Scenic River designations for candidate rivers as part of the CCP revision process.”

Several comments indicate that recreational use on rivers needs to be managed better and river users should be dispersed or limited to avoid affecting the values of Refuge rivers. Some people recommend a permit system to help. They feel that the CCP should provide guidance regarding user capacity and mitigating user impacts as well as studies quantifying and monitoring user related impacts on the rivers. Others comment on the importance of management approaches to maintain the integrity and purposes of designated rivers, and that these should be outlined in the CCP.

304.19: “The CCP should adhere to the following Wild and Scenic River planning guidance to address “user capacity:” Establish direction that is proactive, not reactive, in controlling impacts from visitor use, aircraft use, and facilities. Analyze the number of users and what the use means for outstanding remarkable values and other resources. Address the maximum number of people that can be accommodated by conducting a numerical analysis of visitor use and adopting standards or criteria for managing use within the limits through monitoring and other management actions.”

Many comments provide ideas about how to gather information about potential WSRs on the refuge. For example, some comments indicate that tribal watershed management could provide important information regarding scenic river management. Others point out the importance of continued monitoring of waters within the refuge for water quality and quantity.

Visitor Use

Some specific comments on Visitor Use were received, typically focusing on the perceived need to limit the size of groups on rivers and in the backcountry. Recreation and land management were the key topics in this area of comments; however, most comments relating to recreation are discussed in the Government Activities and Private Activities sections in Chapter 4. Several people comment on the various conflicts that exist on the Refuge, including commercial vs. private party, or recreation vs. subsistence uses. For example:

69.2: “I see a significant conflict between commercial and private party use of the rivers. Commercial tours should be strictly limited. Private, non-commercial use should trump both (commercial) trapping and tour groups. It is public land - commons, not something benefitting private interests... [Need] regulations to limit over-use and over-crowding.”

85.3: “I foresee greater conflicts between recreational and subsistence users. On the other hand, I believe it is possible for the Refuge staff to implement ANILCA properly and allow residents to access to a true subsistence of life, for those who desire it; ...prioritize subsistence hunting but also allow continued hunting to the maximum extent; encourage the building of new subsistence cabins and families; encourage trapping/traditional skills;...inform younger people in the villages of these opportunities and view subsistence as a viable and legitimate lifestyle in the long-term.”

318.6: “One issue is the fact that commercial users are permitted/regulated but independent users are not. Typically the independent users have the least amount of knowledge about how to safely and cleanly travel in this country, and how to avoid creating problem bears for those who follow, if not for themselves. Yet they do not have to have any contact with the Refuge staff. Setting up some form of required interaction with the Refuge would create a much needed education opportunity, such as occurs in Gates of the Arctic. The educational groups have been allowed to be huge (compared to commercial group size limits) and are often from Outside and unaware of what they are getting themselves into. Their large numbers and lack of knowledge has had high impacts on the habitat and on our groups.”

300.7: “The Refuge should continue to focus on providing opportunities for authentic adventure, challenge, discovery and exploration, as well as solitude. Subject to protection of wilderness qualities, respect for visitor independence, self-reliance, and freedom must be an important management goal. The plan should recognize that where these conditions prevail in real wilderness, there can be risks. The agency should not attempt to make the area “safe” or assume responsibility for the visitor. Agency presence should be as subtle, unobtrusive, and low profile as possible. Recreational “improvements” – facilities, cabins, trails, bridges, signs, etc., must be prohibited. The agency should implement use limits on rivers where overuse is occurring and should be proactive in preventing

crowding and disruption of wildlife everywhere. Implement group size limits of 7 for backpacking groups and 10 for river floating groups. In specific areas where the rationing of use is necessary it must not favor commercial guiding operations or people with greater financial resources.”

Water Quality

Concerns about water quality reach every corner of the refuge. Misuse, lack of precipitation, and contamination are key topics. The water is very important for all of the inhabitants and wildlife, not only for survival, but for the well-being of the refuge.

440.8: “Freshwater is critical to abundant life in the Arctic. We are in a long period of drying; ponds are disappearing, lake and river levels are dropping. While we are not able to control precipitation, we can control the use, or misuse of water resources. Human use should take preference over industrial use, and industrial use must be regulated so that it does not affect healthy and natural wildlife populations. Water quality should not be degraded by either human or industrial use.”

627.5: “Water quality degradation is one of EPA’s [Environmental Protection Agencies] primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the state of Washington (and Tribes with approved water quality standards) to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet that state and tribal water quality criteria and associated beneficial uses. While the Refuge may not contain listed waterbodies, the CCP/EIS [Comprehensive Conservation Plan/Environmental Impact Statement] document should describe existing restoration and enhancement efforts for those waters, how the CCP will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality.

Public drinking water supplies and/or their source areas often exist in many watersheds. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. If source water areas exist within or around the Refuge, the 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. As a result, EPA recommends the FWS [US Fish and Wildlife Service] contact the Alaska Department of Environmental Conservation to obtain information about source water areas in and around the Refuge. If projects under the proposed CCP would affect drinking water, then the CCP/EIS should include contaminants of concern and measures that would be taken to protect drinking water and source areas. Groundwater extraction, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicles and other equipment can all affect surface and groundwater quality.”

Fire Management Policy

A few commenters discuss fire management on the refuge, identifying several viewpoints. Some respondents think that fires should burn naturally; others think they should be suppressed.

84.3: “The one issue that needs attention is wildfires. My feelings are that all wildfires should be put out (fought) by B.L.M fire fighters and cabins should be protected, private land, etc. There is also the safety issue of flying in heavy smoke as a result of the idiotic policy of not fighting wilder fires in the Refuge. This I believe is a dangerous situation for residents of the Refuge, visitors and pilots...Put out the fires.”

475.3: “Avoid intervening unwisely, as in the wholesale suppression of forest fires carried out in many parts of the country. As much as possible, be wise stewards who allow natural processes to occur as they will. Staff should be there to observe, learn, and share with the public.”

Naming of Features

A few respondents oppose proposals to name features within the refuge and encourage practices that leave minimal footprints as well as maintain the natural character of the land.

417.5: “The Refuge interpretive program should focus on providing leave-no-trace information and on encouraging behaviors that minimize impacts on resources, visitors, and subsistence users. Information that educates the public about the natural history of the Refuge and its biological and physical qualities deepens the appreciation of visitors without detracting from their ability to experience the Refuge as an unmodified landscape, and should be encouraged. To maintain the Refuge’s aura of exploration, mystery, and “the unknown,” the agency should not produce materials that feature the “attractions.” Nor should it develop materials recommending campsites, routes, river crossings, etc. that domesticate the experience and lessen the spirit of adventure, self-reliance, and independence.”

Refuge Treaties and Agreements

Several respondents express a desire to follow treaties that have been in place for many years. Some natives feel that these treaties have been used as ways to manipulate their lifestyles and want to be guaranteed the ability to continue their ancestral way of life. Another concern is the desire to ensure compliance with the international treaty that protects polar bears and their denning areas.

483.4: “International treaty obligations call for protection of polar bear denning areas. The United States is party to the Agreement on the Conservation of Polar Bears which states that contracting parties shall take appropriate action to protect the ecosystems of which polar bears are a part, with special attention to denning and feeding sites and migration paths, and shall manage polar bears in accordance

with sound conservation practices. Development in the Arctic Refuge would violate this international agreement.”

870.3: “Our way of life is to make sure that when they created the refuge on top of us without ever consulting with us and saying that the jurisdiction that we have is something that we have never taken to court. We own traditionally from up here, from the border since a border has been created to divide the family, so it's a continental divide going all the way down and then it heads up the Tanana and all the way up to, including Kaktovik. That's the Gwich'in territory and that's what we're talking about here.”

860.3: “Many of you heard me talk about this, but I want to remind you again. There's a treaty or a contract that was signed by the villages and it says for the Fish and Wildlife, they also signed it, too, that they will protect our ancestral subsistence way of life in the Yukon Flats. And I think that's one of the things that I would rather have the Fish and Wildlife to remember that and to always protect and not bow down to the oil development. It may sound good at this time, but in the future, that's all we have left is the land, the resources.”

6.0 Legal Consistency

The final area of action coding and analysis is Legal Consistency. In this action area, comments about a variety of legal issues are captured. There are several comments on the legal consistency of various acts, treaties, and policies that affect the Refuge. These comments vary from citing specific property laws to discussing the authority of various government agencies with regard to the Refuge. Respondents often explain why they think that planning efforts are inconsistent with specific laws, regulations, or policies; or they discuss what they feel should be done to ensure the CCP is revised to be consistent with them. The common legal themes are addressed below.

Federal Laws/Regs/Rules/Polices

The vast majority of comments regarding Federal constitution, laws, acts, rules, and regulations call for clarification on the authority and roles of the Service and Congress, and the purposes of the CCP in addressing development concerns within the Refuge – particularly wilderness designation and management within the 1002 area. Other comments call for better management of existing designated lands, including consideration of all reasonable management alternatives that the Service has authority to adopt, prior to designating additional lands. There are several comments on the history, impacts and purposes of the 1002 area, ANILCA, and the Refuge in general, with some calling for adherence/revision to policies outlined in these acts. For example:

11.3: “A concern that I have, and a reason why I have included comments about the benefits of opening the Section 1002 area, is based on a statement by the U.S. Fish and Wildlife Service (USFWS) in the formal scoping notice which notes that some concerns and interests related to the Refuge will not be addressed in the Revised CCP. “For example, the U.S. Congress has reserved for itself in Section 1002(1) of the ANILCA, 16 U.S.C. 3142(1), the decision as to whether or not the Refuge Coastal Plan (also called the 1002 Area) should be made available for oil and gas development. Therefore, the USFWS does not have the authority to decide this issue, and we will not consider or respond to comments that support or oppose such development during this CCP process.” The language in the notice could be read to suggest that the USFWS believes Congress has reserved only the question of oil and gas development for itself and that there is administrative discretion regarding wilderness designations. I believe that, in point of fact and as a matter of law, the decisions about both types of land uses have been reserved by Congress for Congress. I would appreciate your clarifying the position of the USFWS on this point in a separate letter to me.”

388.1: “60 Plus Association is writing to urge you to develop a balanced and fair Comprehensive Conservation Plan that addresses only those matters directly pertinent to the authority of the U.S. Fish and Wildlife Service. We are particularly concerned that potential wilderness reviews will be misused to further a federal conservation plan without the consent or will of the U.S. Congress. Any attempt to restrict access through wilderness designations conflicts with the objectives of the Arctic Refuge, exceeds the parameters of FWS authority over the Refuge, and can cause economic harm.”

415.2: “Wilderness review, including the 1002 area. Section 1317 of ANILCA, the General Wilderness Review Provision, requires the Secretary of the Interior to “...review, as to their suitability or non-suitability for preservation as wilderness,” lands not designated as wilderness by ANILCA and report his findings to the President. The President in turn is to report his own recommendations to Congress. In addition, as federal land management agencies revise and update land management plans, non-wilderness portions of the lands they administer are reviewed as to their suitability or non-suitability for addition to the Wilderness System. Thus citizens and members of Congress expect the Service to include the non-wilderness 1002 area in its comprehensive, legally required wilderness review.”

Many commenters feel that the FWS should not address comments regarding oil and gas development or even provide studies on lands for consideration of wilderness designation, asserting that decisions regarding such development and designation can only be made by Congress and the studies would be a misuse taxpayer of resources. Others feel that question of wilderness designation has been studied in depth in previous studies and plans. Some comments recommend analysis and explanation of Service processes to protect the integrity, purpose, and vision of the Refuge from both inside and outside influences (i.e. potential impacts from oil and gas activities in Canada, or on state lands). For example:

367.38: “FWS should continue “prohibiting production of oil and gas leasing or other development leading to production of oil and gas, and construction of oil and gas support facilities in the Refuge, unless authorized by Congress.” Arctic Refuge CCP at p. xv (1988); see also *id.* at Table 10, p. 182 (“leasing, development and production of onshore oil and gas for commercial purposes. Includes all associated above and below ground facilities,” not permitted unless authorized by Congress); *id.* at p. 216 (prohibiting onshore support facilities for offshore development); *id.* at Table 10, p. 183 (prohibition on removal of sand and gravel for commercial purposes). These prohibitions include seismic exploration and other geological exploration in the coastal plain. The revised CCP should acknowledge and support the continuation of the existing prohibitions on oil and gas, leasing, development, and production of KIC and ASRC lands. Because all of these points are based in law, see e.g., ANILCA Section 1003, these prohibitions cannot be changed.”

Several comments refer to the scope of the CCP and recommended that certain information should be included in or omitted from the original outlined scope, such as including analysis on the Service’s implementation of protective measures and future implementation goals for applicable international fish and wildlife treaties and agreements. Others feel that the CCP should review current acts and policies (e.g., ANILCA) that impact wildlife, water quality, and subsistence rights, among other resources within the Refuge. For example:

629.6: “The Service, refuge manager, and refuge staff must recognize that protecting and maintaining natural diversity, ecological processes, and biological integrity of the Arctic Refuge is an over-arching principle and purpose for the Refuge. This concept was central in the historic vision of the founders of the Refuge and has been reinforced through ANILCA purposes and the Refuge Improvement Act, which directs that biological integrity, diversity and environmental health be protected relative to the Refuges specific ecological characteristics. This means that the Arctic Refuge’s unique naturalness, wildness and undisturbed condition be preserved and maintained.”

There were several comments regarding the impact of various acts and policies on Native Alaskans. Many recommend that the Service provide education opportunities for natives so that they could be better informed on the potential impacts of specific policies and regulations on tribal rights, lands, and subsistence. Some even recommend renegotiation or revision of various tribal treaties.

Other comments recommend that the CCP address protection of compliant industries and permitted uses from frivolous law suits from outside groups.

Appendix A: Demographics

Demographics

When comments are captured in the content analysis process, certain demographic information is also coded, collected, and entered in the project database. Demographic coding allows managers to form an overall picture of who is submitting comments, where they live, their general affiliation with various organizations or government agencies, and the manner in which they respond. The database can be used to isolate specific combinations of information about public comment. For example, a report can include public comment only from people in Alaska or a report can identify specific types of land users such as recreational groups, agricultural organizations, or businesses.

Although demographic information is captured and tracked, it is important to note that the consideration of public comment is not a vote-counting process. Every comment and suggestion has value, whether expressed by one or a thousand respondents. All input is considered, and the analysis team attempts to capture all relevant public concerns in the analysis process. For the ANWR Revised Comprehensive Conservation Plan, 1480 responses were received and processed, representing and 1647 signatures.

In the tables displayed below, please note that demographic figures are given for number of responses, respondents, and signatures. For the purposes of this analysis, the following definitions apply: “response” refers to a discrete piece of correspondence; “respondent” refers to each party for whom original correspondence was logged. (e.g., a single response may represent several organizations without one primary author); and “signature” simply refers to each individual who adds his or her name to a response, endorsing the view of the primary respondent.

Geographic Representation

Geographic representation is tracked for each respondent during the course of content analysis. Letters and emails were received from 49 of the United States. States of residence for each individual signature were tracked for multiple respondent responses.

Table A1 - Geographic Representation of Response by Country and State/Territory

| Country | State | Number of Respondents | Number of Signatures |
|---------------|----------------------|-----------------------|----------------------|
| United States | Alaska | 420 | 455 |
| | Arkansas | 3 | 3 |
| | Arizona | 23 | 23 |
| | California | 111 | 112 |
| | Colorado | 36 | 95 |
| | Connecticut | 11 | 12 |
| | District of Columbia | 15 | 39 |
| | Delaware | 1 | 1 |
| | Florida | 48 | 49 |

| Country | State | Number of Respondents | Number of Signatures |
|---------|----------------|-----------------------|----------------------|
| | Georgia | 7 | 7 |
| | Hawaii | 6 | 6 |
| | Idaho | 5 | 5 |
| | Iowa | 6 | 6 |
| | Illinois | 29 | 29 |
| | Indiana | 8 | 8 |
| | Kansas | 1 | 1 |
| | Kentucky | 1 | 1 |
| | Louisiana | 2 | 2 |
| | Massachusetts | 21 | 22 |
| | Maryland | 23 | 24 |
| | Maine | 9 | 9 |
| | Michigan | 7 | 7 |
| | Minnesota | 20 | 20 |
| | Missouri | 20 | 20 |
| | Mississippi | 3 | 3 |
| | Montana | 10 | 11 |
| | North Carolina | 25 | 27 |
| | Nebraska | 4 | 4 |
| | New Hampshire | 5 | 5 |
| | New Jersey | 13 | 13 |
| | New Mexico | 33 | 33 |
| | Nevada | 2 | 2 |
| | New York | 54 | 54 |
| | Ohio | 24 | 24 |
| | Oklahoma | 5 | 5 |
| | Oregon | 26 | 27 |
| | Pennsylvania | 25 | 25 |
| | Rhode Island | 4 | 4 |
| | South Carolina | 7 | 7 |
| | South Dakota | 2 | 2 |

| Country | State | Number of Respondents | Number of Signatures |
|--------------|-------------------|-----------------------|----------------------|
| | Tennessee | 10 | 10 |
| | Texas | 31 | 32 |
| | Utah | 10 | 10 |
| | Virginia | 21 | 21 |
| | Vermont | 4 | 4 |
| | Washington | 32 | 33 |
| | Wisconsin | 13 | 13 |
| | West Virginia | 1 | 1 |
| | Wyoming | 16 | 16 |
| | International | 16 | 16 |
| | Anonymous/Unknown | 253 | 289 |
| Total | | 1482 | 1647 |

Organizational Affiliation

Responses were received from various organizations and unaffiliated individuals. Organization types were tracked for each letter and email received. Organization Types of each individual signature were tracked for multiple respondent responses.

Table A2 - Number of Respondents/Signatures by Organizational Affiliation

| Organization Field | Organization Type | Number of Respondents | Number of Signatures |
|--------------------|--|-----------------------|----------------------|
| B | Business | 74 | 78 |
| C | County Government Agency/Elected Official | 4 | 5 |
| F | Federal Agency/Elected Official | 9 | 34 |
| I | Individual | 1306 | 1347 |
| PI | Public Interest Group/Political Party | 51 | 145 |
| Q | American Indian Government Agency/Elected Official | 15 | 15 |
| QQ | Tribal Non-Government Organization/Tribal Member | 1 | 1 |
| S | State Government Agency/Elected Official | 21 | 21 |
| T | Town/City Government Agency/Elected Official | 1 | 1 |
| Total | | 1482 | 1647 |

Response Type

Response types were tracked for each response received on the project. Responses were received in the form of Letters, Forms, Forms Plus, Action Alerts, Public Meeting Comment Forms, Public Meeting Transcripts, and Public Meeting/Workshop Group notes.

Table A3 – Number of Responses/Signatures by Response Type

| Response Type # | Response Type | Number of Responses | Number of Signatures |
|-----------------|--|---------------------|----------------------|
| 1 | Letter | 447 | 586 |
| 2 | Form or Letter Generator | 10 | 10 |
| 3 | Form Plus / Letter Generator Plus | 538 | 546 |
| 5 | Action Alert | 1 | 1 |
| 7 | Public Meeting Comment Form | 229 | 239 |
| 8 | Public Meeting Transcript (hearing/oral testimony) | 247 | 257 |
| 9 | Public Meeting/workshop group notes | 8 | 8 |
| Total | | 1480 | 1647 |

Delivery Type

Delivery types were tracked for each response received on the project. Responses were received in the form of Email, Fax, Hand Delivered or Oral Testimony, US Mail or Commercial Carrier, Telephone, and Web-based submission.

Table A4 – Number of Responses/Signatures by Delivery Type

| Delivery Type Code | Delivery Type | Number of Responses | Number of Signatures |
|--------------------|----------------------------------|---------------------|----------------------|
| E | Email | 1154 | 1289 |
| F | Fax | 9 | 9 |
| H | Hand-Delivered or Oral Testimony | 49 | 49 |
| M | US Mail or Commercial Carrier | 125 | 154 |
| T | Telephone | 3 | 3 |
| W | Web-based submission | 140 | 143 |
| Total | | 1480 | 1647 |

Appendix B: Organized Response Report

Organized response campaigns represent 98.4 percent of the total responses received during the public comment period for the proposal (92,581 forms out of 94,061 responses).

Form Responses

Forms are defined as five or more responses, received separately, but containing identical text. Once a form is identified, a “form master” is entered into the database with all of the content information. All responses with matching text are then linked to this master form within the database with a designated “form number.” If a response adds something substantive to the basic text presented in a given form, it is entered as an individual letter and called a “form plus”. Duplicate responses from four or fewer respondents are also entered as individual letters.

Forms are designated with a number for the purpose of tracking subsequent submissions. Form numbers are assigned as each “form master” is identified. The following table presents the number of responses, and signatures associated with each form as well as brief content summaries. Ten forms were identified.

Table B1 – Form Letter Summary

| Form Number | Number of Responses | Description of Form |
|-------------|---------------------|--|
| 1 | 20012 | Would like stronger protections for areas like the Coastal Plain and other parts of the Refuge that are currently without wilderness designation, because its fragile ecosystem could be destroyed by oil and gas exploration and drilling. Would like all of the Refuge given wilderness designation to protect landscape for polar bears, caribou, migratory birds, and the Gwich'in people. |
| 2 | 549 | ANWR was established to preserve wilderness values, but remains vulnerable to exploitative industry, including the vital Coastal Plain region (1002 area). It is home to diverse habitats, including numerous species of birds that begin their journey to all 50 states. The Gwich'in people regard the Coastal Plan as “The Sacred Place Where Life Begins.” Urges that a wilderness review for all lands not already designated in the Refuge including the entire coastal plain, and recommend to Congress their rightful inclusion in the National Wilderness Preservation System. The Refuge should be managed in a way that safeguards the natural biodiversity and processes of the ecosystem as a whole to ensure the unique wildlife, wilderness, and subsistence values of the Refuge are protected now and for future generations. |
| 3 | 538 | Keep the 1002 area open to responsible oil and gas development in the future. Strongly opposes the new wilderness designation of the 1002 area. Responsible development would create thousands of jobs for Alaskans, and provide substantial increase for the Trans-Alaska Pipeline, a source of domestic energy production. Permanently locking up this resource is not in our best national interest. |
| 4 | 341 | Recommend permanent protection through wilderness designation for the coastal plain and all other lands not yet designated wilderness to ensure it is protected forever from oil and gas drilling. There is no safe way to drill, no way to guarantee safety of wildlife, and no guarantee it will be protected for future generations. Only way to protect is to permanently protect it with wilderness designation. |

| Form Number | Number of Responses | Description of Form |
|-------------|---------------------|--|
| 5 | 8 | Continued development and exploration of the resources within the boundaries of ANWR poses an imminent threat to the health and welfare of multiple communities and has the potential to cause permanent and irreparable damages around the entire globe. ANWR is critical to the existence of the Porcupine Caribou herd, a subsistence resource essential to the Indigenous Arctic inhabitants. The Refuge is the last intact Arctic and Subarctic ecosystem left in North America. Migratory birds nest and utilize the coastal plain. There are approximately 40,000 caribou calves birthed and nursed within the Refuge each year. |
| 6 | 43 | Honor the Refuge in its 50th year and support wilderness designation. It is home to 3 bears, grizzly, black and polar, caribou and a migratory destination to more than 198 bird species from six continents and every state in the nation. It is a vital part of the larger ecosystem and connected to existing wilderness through its scenic habitats, watersheds, rivers, and bird and caribou migrations. Include a wilderness review for the entire Coastal Plan and for all refuge lands not yet designated as wilderness. Any oil and gas leasing, exploration and development would permanently harm the wildlife and wilderness values, especially birds like long-tailed ducks and loons and shorebirds. |
| 7 | 4384 | <p>The revised Plan should ensure protection of the ecological diversity and unparalleled wilderness values. The Refuge contains the greatest wildlife diversity of any protected area in the circumpolar north. The Refuge provides habitat for 180 species of birds for nesting, breeding, staging, and molting. The Refuge provides important habitat for 36 land mammals and nine marine mammals including such iconic Arctic species as polar bear, muskox, arctic fox, and beluga whale.</p> <p>The Plan should ensure protection of the Refuge's wilderness qualities. The plan should provide for a complete review of all non-designated refuge lands, including the Coastal Plain and recommend inclusion of these lands within the National Wilderness Preservation System. The plan should also address the management of recreation, research, and educational opportunities that enable visitors to the Refuge to experience authentic adventure, exploration, and solitude while also providing for the long-term health of wildlife populations and habitats.</p> |
| 8 | 45950 | <p>ANWR is the most important onshore denning habitat for America's threatened polar bears. It is home to grizzly bears, caribou, musk oxen, Dall sheep, wolves and rare wolverines, and important to millions of migratory birds. Conduct a full wilderness review of the entire Refuge and make a Wilderness recommendation for the entire Coastal Plain and all lands within the Arctic Refuge not yet designated as Wilderness and ensure it is protected as an intact ecosystem. Prohibit predator control on the Refuge. Protect the full range of natural diversity found in the Refuge. Manage to provide wildlife the space and time to adapt to climate change in the absence of human intervention.</p> <p>Restrict the use of aircraft and establish designated landing zones to mitigate the disruption airplanes cause to fragile tundra ecosystems, wildlife, and the wilderness experiences of those visiting the Refuge. The use of aircraft to spot game for hunter harvest or viewing wildlife should also be prohibited.</p> <p>Identify and designate as commercial-free areas unique or fragile ecological areas of the Refuge. Recreation in these areas should be strictly monitored and regulated in order to protect these locations. The importance of the Refuge will continue to increase as other regions of the United States succumb to development pressure. Consider the national and global significance of the Refuge.</p> |
| 9 | 20655 | Considers the potential economic consequences designating additional wilderness lands could have on indigenous populations. For over 10,000 years Native peoples have relied on the natural resources present in the Arctic National Wildlife Refuge (ANWR) to provide sustenance and maintain cultural traditions. Indigenous people, particularly the Inupiat of the North Slope Borough, have developed ecologically-minded and culturally-distinctive practices that have ensured the sustainability of |

| Form Number | Number of Responses | Description of Form |
|---------------|---------------------|--|
| | | local wildlife and of their heritage. In order for these peoples to preserve their culture, they must be given full access to these areas to hunt and fish without burdensome regulations and limitations. They also rely on local oil and gas production for revenues. Restricting land that has been used responsibly by Native populations for centuries endangers their way of life and sets a dangerous precedent. |
| 10 | 101 | We must finally give the Coastal Plain of the Refuge, the permanent protection it deserves so that it can forever remain the best example of our natural wilderness heritage. Urged to do a wilderness review for all lands not already designated wilderness in the Arctic Refuge, including the entire coastal plain, and recommend to Congress their rightful inclusion in the National wilderness Preservation System. The Refuge should also be managed in a way that safeguards the natural biodiversity and processes of the ecosystem as a whole. This will ensure the unique wildlife, wilderness, and subsistence values of the Refuge are protected now and for future generations. |
| Total: | 92,581 | |

Table B2 – Responses by State

| State | Form 1 | Form 2 | Form 3 | Form 4 | Form 5 | Form 6 | Form 7 | Form 8 | Form 9 | Form 10 |
|----------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------|
| Alaska | 81 | 45 | 534 | 5 | 6 | 34 | 11 | 173 | 76 | 93 |
| Alabama | 89 | 1 | | 2 | | | 16 | 202 | 331 | |
| Arizona | 503 | 12 | | 6 | | 2 | 87 | 1091 | 350 | |
| Arkansas | 75 | 1 | | 1 | | | 21 | 201 | 147 | |
| California | 3754 | 93 | | 25 | 1 | | 944 | 8273 | 2054 | 1 |
| Colorado | 873 | 23 | 1 | 8 | | 1 | 95 | 1584 | 302 | 1 |
| Connecticut | 290 | 5 | | 2 | | | 2 | 659 | 240 | |
| Delaware | 46 | 2 | | 3 | | | 9 | 141 | 123 | |
| District of Columbia | 34 | 1 | | 2 | | | 5 | 107 | 24 | |
| Florida | 1073 | 36 | | 42 | | | 341 | 2960 | 1445 | |
| Georgia | 248 | 8 | | 4 | | | 50 | 659 | 851 | |
| Hawaii | 101 | 1 | | 3 | | | 16 | 245 | 68 | |
| Idaho | 101 | 4 | 2 | 2 | | 2 | 16 | 194 | 99 | |
| Illinois | 851 | 21 | | 7 | | | 177 | 1910 | 832 | |
| Indiana | 255 | 7 | | 7 | | | 56 | 612 | 509 | |
| Iowa | 128 | 3 | | 6 | | | 24 | 273 | 147 | |
| Kansas | 121 | 3 | | 3 | | | 27 | 247 | 223 | |
| Kentucky | 121 | 1 | | | | | 23 | 299 | 293 | |
| Louisiana | 80 | 4 | 1 | 2 | | | 17 | 177 | 240 | |
| Massachusetts | 588 | 11 | | 15 | | | 5 | 1356 | 369 | |
| Maine | 112 | 6 | | 8 | | | 47 | 328 | 88 | |
| Maryland | 315 | 7 | | 13 | | | 62 | 896 | 514 | 1 |
| Michigan | 496 | 18 | | 4 | 1 | 1 | 108 | 1117 | 763 | |
| Minnesota | 382 | 9 | | 7 | | 3 | 113 | 641 | 270 | |
| Missouri | 279 | 7 | | 5 | | | 61 | 606 | 385 | |
| Mississippi | 39 | 3 | | 1 | | | 10 | 115 | 157 | |
| Montana | 83 | 3 | | 1 | | | 21 | 187 | 63 | |
| Nebraska | 61 | 2 | | 2 | | | 18 | 127 | 91 | |
| Nevada | 136 | | | 2 | | | 18 | 376 | 226 | |
| New Hampshire | 130 | 4 | | 3 | | | 1 | 327 | 101 | |
| New Jersey | 622 | 17 | | 9 | | | 138 | 1452 | 582 | |

| State | Form 1 | Form 2 | Form 3 | Form 4 | Form 5 | Form 6 | Form 7 | Form 8 | Form 9 | Form 10 |
|------------------------------------|--------------|------------|------------|------------|----------|-----------|-------------|--------------|--------------|------------|
| New Mexico | 310 | 10 | | 8 | | | 42 | 602 | 77 | |
| New York | 1490 | 39 | | 13 | | | 399 | 3476 | 1109 | 2 |
| North Carolina | 444 | 18 | | 13 | | | 125 | 1106 | 1151 | |
| North Dakota | 19 | | | | | | 6 | 48 | 27 | |
| Ohio | 532 | 11 | | 6 | | | 148 | 1221 | 689 | |
| Oklahoma | 70 | 1 | | 1 | | | 13 | 195 | 178 | |
| Oregon | 668 | 22 | | 21 | | | 153 | 1141 | 212 | |
| Pennsylvania | 800 | 21 | | 9 | | | 203 | 1999 | 809 | |
| Rhode Island | 63 | 2 | | 1 | | | 16 | 167 | 57 | |
| South Carolina | 129 | 2 | | 2 | | | 48 | 327 | 549 | |
| South Dakota | 31 | 1 | | 1 | | | 4 | 49 | 30 | |
| Tennessee | 208 | 6 | | 1 | | | 44 | 522 | 441 | |
| Texas | 796 | 21 | | 8 | | | 179 | 1857 | 1399 | |
| Utah | 134 | 1 | | 1 | | | 18 | 300 | 207 | |
| Vermont | 102 | 4 | | 3 | | | | 196 | 39 | |
| Virginia | 429 | 9 | | 11 | | | 88 | 997 | 697 | |
| Washington | 973 | 11 | | 24 | | | 180 | 1604 | 432 | 1 |
| West Virginia | 79 | | | 1 | | | 13 | 129 | 197 | |
| Wisconsin | 376 | 12 | | 12 | | | 83 | 747 | 333 | 1 |
| Wyoming | 36 | | | 5 | | | 11 | 79 | 37 | |
| Unknown/Intl (incl GU, PR, VI, PW) | 256 | | | | | | 72 | 1653 | 22 | 1 |
| Total | 20012 | 549 | 538 | 341 | 8 | 43 | 4384 | 45950 | 20655 | 101 |

